

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOB'S DAUGHTERS INTERNATIONAL,

NO. 16-cv-1573-RSL

Plaintiff,

DECLARATION OF BRIAN T.
MCKERNAN

V.

HEIDI YOAST,

Defendant.

HEIDI YOAST,

Counterclaim-Plaintiff,

V.

JOB'S DAUGHTERS INTERNATIONAL, and
ROD REID, an individual,

Counterclaim-Defendants.

I, Brian T. McKernan, hereby declare as follows:

1. I am over the age of eighteen (18), licensed to practice in the state of Nebraska (NE Bar No. 22174) and admitted to the Washington State Bar *pro hac vice* in this matter. I am counsel of record for Plaintiff Job's Daughters International and I make this declaration on personal knowledge and am competent to testify as set forth herein..

2. Attached as Exhibit A is a true and accurate copy of Defendant's Answers To Plaintiff's First Set of Document Requests. Request No. 4 (pg. 5) sought "all documents evidencing, referring to or discussing your use or Pink Power Printing's use of Plaintiff's Marks

DECLARATION OF BRIAN T. MCKERNAN
(16-cv-1573-RSL)

Williams, Kastner & Gibbs PLLC
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1 and any marks similar thereto.” Similarly, Request No. 6 (pg. 6) sought “all documents
2 evidencing, referring to or discussing any and all invoices You or Pink Power Printing issued for
3 goods sold that display any of Plaintiff’s Marks, and any marks similar therefore.”
4

5 3. Attached hereto as Exhibit B are true and accurate copies of all invoices produced
6 by Defendant in this matter. For ease of reference, the invoices received from Defendant have
7 been arranged in chronological order.
8

9 4. Attached hereto as Exhibit C is a true and accurate copy of the 30(b)(6)
10 Deposition Notice served on Job’s Daughters by Defendant.
11

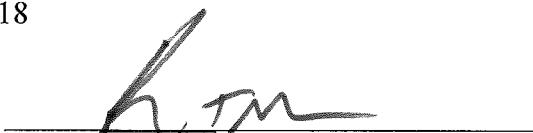
12 5. Attached hereto as Exhibit D are true and accurate copies of deposition excerpts
13 and exhibits from the deposition of Susan Goolsby taken on January 31, 2018 together with a
14 summary page indicating the included excerpts and exhibits.
15

16 6. Attached hereto as Exhibit E are true and accurate copies of deposition excerpts
17 and exhibits from the deposition of Heidi Yoast taken on February 2, 2018 together with a
18 summary page indicating the included excerpts and exhibits.
19

20 7. Attached hereto as Exhibit F. are true and accurate copies of deposition excerpts
21 and exhibits from the deposition of Rod Reid taken on September 14, 2017 together with a
22 summary page indicated the included excerpts and exhibits.
23

24 I declare under penalty of perjury that the foregoing is true and correct to the best of my
25 knowledge and recollection.
26

27 DATED this 26th day of March 2018
28



27 DECLARATION OF BRIAN T. MCKERNAN (16-cv-1573-RSL)
28

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CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2018, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following:

Rodney L Umberger, Jr rumberger@williamskastner.com, ssanh@williamskastner.com

Daniel Velloth dvelloth@williamskastner.com, dlevitin@williamskastner.com, mphilomeno@williamskastner.com

Brian T. McKernan bmckernan@mcgrathnorth.com

Patricia I. Forman patriciaforman@gmail.com

Tracey v. Munger tracey@groveslawoffices.com

DATED this 26th day of March, 2018.

s/ Rodney L. Umberger

s/ Daniel J. Velloth

Rodney L. Umberger, Jr., WSBA #24948
Daniel J. Velloth, WSBA #44379
WILLIAMS, KASTNER & GIBBS PLLC
601 Union Street, Suite 4100
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Telephone: (206) 628-6600
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rumberger@williamskastner.com
dvelloth@williamskastner.com

Attorneys for Plaintiff/Counterclaim-Defendant
Job's Daughters International

DECLARATION OF BRIAN T. MCKERNAN (16-cv-1573-RSL)

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Hon. Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOB'S DAUGHTERS INTERNATIONAL,

Plaintiff,

v.

HEIDI YOAST,

Defendant.

NO. 16-CV-01573-RSL

**DEFENDANT'S ANSWERS TO
PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS**

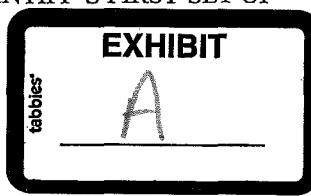
TO: Plaintiff JOB'S DAUGHTER'S INTERNATIONAL;

AND TO: Rodney L. Umberger and Daniel J. Velloth of Williams Kastner, & Gibbs, PLLC, and Brian T. McKernan of McGrath North Mullin & Kratz, PC, Plaintiff's Attorneys of Record.

PRELIMINARY STATEMENT

These responses are made solely for the purpose of this action. The responses provided herein relate exclusively to the issues and transactions raised in this lawsuit and no other issues or transactions. Each response is subject to all appropriate objections (including, but not limited to, objections concerning competency, relevancy, materiality and admissibility) which

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 1



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1 would require the exclusion of any document or any statement contained herein if the requests
2 were asked of, or if any statement contained therein was made by, a witness present and
3 testifying in court. All objections and grounds therefore are reserved and may be interposed at
4 the time of trial.

5 Discovery is ongoing at this time. All of these responses are therefore based on such
6 information and documents presently available to Defendant. Accordingly, Defendant reserves
7 the right to modify and/or supplement these responses with such pertinent documents and/or
8 information as may be subsequently discovered, without prejudicing its right to introduce at
9 trial evidence relating to such subsequently discovered documents and/or information. Nothing
10 in these responses limits or waives Defendant's rights to provide additional responses or offer
11 additional evidence at the time of any hearing or trial of this action or to provide information
12 not yet obtained by or known to Defendant. Moreover, the following responses are subject to
13 correction for inadvertent errors or omissions, if any such errors or omissions should be found
14 to exist.

15 Defendant reserves the right to introduce at trial any and all documents heretofore or
16 hereafter produced by the parties in this action or by any third party that support or tend to
17 support the contentions of Defendant at trial or in support of or in opposition to any motion in
18 this case.

19 No admissions of any nature whatsoever are implied or should be inferred. The fact
20 that any Request has been responded to should not be taken as an admission or as an
21 acceptance of the existence of any facts set forth or assumed by such a Request. Neither should
22 it be construed as an admission that such information is relevant to the subject matter of this
23 litigation or constitutes admissible evidence.

24

25 **GENERAL OBJECTIONS**

26 In addition to the Preliminary Statement, Defendant makes various general objections

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 2

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1 applicable to each and every Request. These objections are incorporated by reference into
2 each and every specific response set forth below.

- 3 1. These responses to the Document Request represent Defendant's reasonable efforts to
4 provide the information within Defendant's current knowledge and based upon
5 documents in Defendant's possession, custody or control.
- 6 2. These responses are made without prejudice to Defendant's right to introduce evidence
7 of subsequently discovered facts, documents or writings at trial. Defendant reserves her
8 right to introduce evidence of subsequently discovered facts, to alter or amend her
9 responses set forth herein, and otherwise to assert factual and legal contentions as
10 additional facts are ascertained, analyses are made, and legal research is completed. By
11 this reservation, Defendant does not in any way assume a continuing responsibility to
12 supplement her responses to the Document Request beyond those required under the
13 Federal Rules of Civil Procedure. Defendant objects to each request to the extent it may
14 seek to impose any such continuing duty. In addition, Defendant objects to each and
15 every category of the Document Request insofar as it may be construed as limiting or
16 restricting Defendant's right to rely upon any document or information for any purpose
17 whatsoever, including the use of responsive non-privileged documents or information as
18 evidence at any subsequent hearing, trial, or other proceeding.
- 19 3. Defendant intends to exercise her right to produce the requested documents as they are
20 kept in the usual course of business. As a result, many of the documents which may be
21 responsive to one request may also be responsive to another request.
- 22 4. Defendant objects to the entire Document Request to the extent that Plaintiff requests
23 information or documents protected by any privilege, including the attorney-client
24 privilege or work product doctrine, and Defendant and her counsel hereby assert such
25 privileges.

26
DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 3

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5. Defendant objects to each document request to the extent it seeks documents that are equally available to the Plaintiff.
6. Defendant objects to each document request to the extent that it is not limited to documents in Defendant's possession, custody or control.
7. The objections set forth above and below are made as to the matters that are clearly objectionable from the face of the Document Request. These objections are made without prejudice to or waiver of Defendant's right to object on all appropriate grounds to the production of specific documents or things hereafter, either prior to, or at the time of, production of said documents.
8. Defendant will make reasonable efforts to respond to each request for documents to the extent that no objection is made, as Defendant understands and interprets the request. If Plaintiff subsequently asserts any interpretation of any requests for documents that differs from that of Defendant, Defendant reserves the right to supplement her objections and responses.
9. An indication that Defendant will produce relevant documents that she believes to be properly called for by a particular request does not necessarily imply the existence of the documents requested.
10. Defendant objects to the time and place set for production of documents in Plaintiff's Demand. To the extent that Defendant agrees to produce documents, such documents will be produced at a mutually agreeable time at the offices of Defendant's Counsel of Record.

RESPONSES

REQUEST NO. 1: All documents identified, utilized, or referred to for purposes of responding to Plaintiff's Interrogatories that are being served contemporaneously herewith.

RESPONSE: Defendant refers to and incorporates by reference her Preliminary Statement and General Objections as though set forth in full herein. Subject to and without

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 4

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1 waiving her objections, Defendant will produce all non-privileged, responsive documents at a
2 mutually agreeable time at the offices of Defendant's Counsel of Record.

3 **REQUEST NO. 2:** Copies of any and all written or recorded statements of any and
4 all individuals taken or acquired by You relating to the above captioned litigation.

5 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
6 Statement and General Objections as though set forth in full herein. In addition to the general
7 reservations, objections and responses stated above, Defendant objects to this Request on the
8 ground it seeks documents protected by the attorney/client privilege and/or attorney work
9 product doctrine. Subject to and without waiving her objections, Defendant will produce all
10 non-privileged, responsive documents at a mutually agreeable time at the offices of
11 Defendant's Counsel of Record.

12 **REQUEST NO. 3:** All documents evidencing, referring to or discussing any and all
13 communication that took place between You and JDI and/or You and any third party pertaining
14 to your use of JDI's Marks, and any marks similar thereto.

15 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
16 Statement and General Objections as though set forth in full herein. Subject to and without
17 waiving her objections, Defendant will produce all non-privileged, responsive documents at a
18 mutually agreeable time at the offices of Defendant's Counsel of Record.

19 **REQUEST NO. 4:** All documents evidencing, referring to or discussing your use or
20 Pink Power Printing's use of Plaintiff's Marks, and any marks similar thereto. This request
21 includes, but is not limited to, documents that list, show, explain, or describe any goods or
22 services advertised, offered for sale, sold, or otherwise distributed by you or Pink Power
23 Printing in any format or outlet.

24 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
25 Statement and General Objections as though set forth in full herein. In addition to the general
26 reservations, objections and responses stated above, Defendant objects to this Request on the

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 5

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1 ground it seeks documents protected by the attorney/client privilege and/or attorney work
2 product doctrine. Subject to and without waiving her objections, Defendant will produce all
3 non-privileged, responsive documents at a mutually agreeable time at the offices of
4 Defendant's Counsel of Record.

5 **REQUEST NO. 5:** All documents evidencing, referring to or discussing any and all
6 permission You or Pink Power Printing sought for use of JDI's Marks, and any marks similar
7 thereto.

8 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
9 Statement and General Objections as though set forth in full herein. In addition to the general
10 reservations, objections and responses stated above, Defendant objects to this Request on the
11 ground it seeks documents protected by the attorney/client privilege and/or attorney work
12 product doctrine. Subject to and without waiving her objections, Defendant will produce all
13 non-privileged, responsive documents at a mutually agreeable time at the offices of
14 Defendant's Counsel of Record.

15 **REQUEST NO. 6:** All documents evidencing, referring to or discussing any and all
16 invoices You or Pink Power Printing issued for goods sold that display any of Plaintiff's
17 Marks, and any marks similar thereto.

18 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
19 Statement and General Objections as though set forth in full herein. Subject to and without
20 waiving her objections, Defendant will produce all non-privileged, responsive documents at a
21 mutually agreeable time at the offices of Defendant's Counsel of Record.

22 **REQUEST NO. 7:** All documents identified, utilized, referred to, quoted in, or relied
23 upon by You in drafting your Answer and Affirmative Defenses or Initial Disclosures,
24 including but not limited to all documents or other evidence that supports any affirmative
25 defenses alleged by You.

26 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 6

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1 Statement and General Objections as though set forth in full herein. In addition to the general
2 reservations, objections and responses stated above, Defendant objects to this Request on the
3 ground it seeks documents protected by the attorney/client privilege and/or attorney work
4 product doctrine. Subject to and without waiving her objections, Defendant will produce all
5 non-privileged, responsive documents at a mutually agreeable time at the offices of
6 Defendant's Counsel of Record.

7 **REQUEST NO. 8:** A sample of, or all documents sufficient to identify all goods and
8 services sold by You or Pink Power Printing in connection with the use of any of JDI's Marks,
9 and any marks similar thereto.

10 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
11 Statement and General Objections as though set forth in full herein. Subject to and without
12 waiving her objections, Defendant will produce all non-privileged, responsive documents at a
13 mutually agreeable time at the offices of Defendant's Counsel of Record.

14 **REQUEST NO. 9:** Documents sufficient to identify all channels of trade through
15 which You or Pink Power Printing advertises, promotes, distributes, or sells (directly or
16 indirectly), any goods or services under or in connection with any of JDI's Marks, and any
17 marks similar thereto, including documents identifying the distributors, retail, or other business
18 outlets that offer for sale Defendant's goods or services.

19 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
20 Statement and General Objections as though set forth in full herein. Subject to and without
21 waiving her objections, Defendant responds that she does not advertise, promote, distribute or
22 sell any goods or services in connection with any of JDI's Marks through any channels of trade.

23 **REQUEST NO. 10:** Documents sufficient to identify any person actually employed,
24 retained, or engaged by You or Pink Power Printing to advertise or promote any goods or
25 services offered for sale by Defendant.

26 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 7

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1 Statement and General Objections as though set forth in full herein. Subject to and without
2 waiving her objections, Defendant responds that she does not, and has never, employed,
3 retained or engaged any employee to advertise or promote any goods or services.

4 **REQUEST NO. 11:** Documents sufficient to show any graphic, package, or other
5 designers contacted or engaged by You or Pink Power Printing with respect to the preparation
6 of any materials bearing or otherwise using any of JDI's Marks, and any marks similar thereto.

7 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
8 Statement and General Objections as though set forth in full herein. Subject to and without
9 waiving her objections, Defendant responds that she does not, and has never, employed,
10 retained or engaged any employee to prepare materials bearing or otherwise using any of JDI's
11 Marks.

12 **REQUEST NO. 12:** All documents concerning Your knowledge of JDI or JDI's
13 Marks, including, but not limited to, all documents reflecting communications about JDI or
14 JDI's use of its Marks, and any marks similar thereto.

15 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
16 Statement and General Objections as though set forth in full herein. Subject to and without
17 waiving her objections, Defendant will produce all non-privileged, responsive documents at a
18 mutually agreeable time at the offices of Defendant's Counsel of Record.

19 **REQUEST NO. 13:** Documents sufficient to show any lawsuit filed by any third party
20 against You or Pink Power Printing claiming trademark infringement, trademark dilution, trade
21 dress infringement, unfair competition, or any violation of Section 43(a) of the Lanham Act, 15
22 U.S.C. § 1125(a).

23 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
24 Statement and General Objections as though set forth in full herein. Subject to and without
25 waiving her objections, Defendant responds as follows: Defendant has never had any lawsuit
26 by any individual or entity, other than JDI, filed against her for any reason.

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 8

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1 **REQUEST NO. 14:** All documents concerning any observations, perceptions,
2 impressions, or inquiries as to whether the goods or services sold, directly or indirectly, by You
3 or Pink Power Printing are produced by, sponsored, or endorsed by, or in any manner
4 associated or affiliated with JDI or any goods or services offered under JDI's Marks.

5 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
6 Statement and General Objections as though set forth in full herein. In addition to the general
7 reservations, objections and responses stated above, Defendant objects to this Request on the
8 grounds that it is vague, overly broad and/or unduly burdensome with respect to the phrase
9 "any observations, perceptions, impressions or inquiries..." Subject to and without waiving her
10 objections, Defendant responds that she has never had any indication that any individual or
11 entity had any perceptions, impressions or inquiries questioning her status as an individual
12 vendor unrelated and/or unaffiliated with JDI.

13 **REQUEST NO. 15:** Documents sufficient to show the annual volume of sales (in
14 dollars and units) of all goods or services sold, directly or indirectly, by You or Pink Power
15 Printing under or in connection with the use of any of JDI's Marks, and any marks similar
16 thereto.

17 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
18 Statement and General Objections as though set forth in full herein. Subject to and without
19 waiving her objections, Defendant will produce all non-privileged, responsive documents at a
20 mutually agreeable time at the offices of Defendant's Counsel of Record.

21 **REQUEST NO. 16:** Documents sufficient to show the calculation of the gross and net
22 profits realized by you or Pink Power Printing, directly or indirectly, from the sale of any goods
23 or services under or in connection with the use of any of JDI's Marks, and any marks similar
24 thereto.

25 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
26 Statement and General Objections as though set forth in full herein. Subject to and without

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 9

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1 waiving her objections, Defendant will produce all non-privileged, responsive documents at a
2 mutually agreeable time at the offices of Defendant's Counsel of Record.

3 **REQUEST NO. 17:** Documents sufficient to show any costs or expenses incurred by
4 You or Pink Power Printing in connection with any goods or services marketed or sold under or
5 in connection with any of JDI's Marks, and any marks similar thereto, including all documents
6 on which you intend to rely to show your costs or expenses in this proceeding.

7 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
8 Statement and General Objections as though set forth in full herein. Subject to and without
9 waiving her objections, Defendant will produce all non-privileged, responsive documents at a
10 mutually agreeable time at the offices of Defendant's Counsel of Record.

11 **REQUEST NO. 18:** Copies of all agreements between You or Pink Power Printing
12 and any other person or entity involving any of JDI's Marks, and any marks similar thereto that
13 relate or refer to the manufacture, advertising, promotion, marketing, distribution, or sale of any
14 goods or services sold under or in connection with any of JDI's Marks, and any marks similar
15 thereto.

16 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
17 Statement and General Objections as though set forth in full herein. Subject to and without
18 waiving her objections, Defendant will produce all non-privileged, responsive documents at a
19 mutually agreeable time at the offices of Defendant's Counsel of Record.

20 **REQUEST NO. 19:** All documents concerning JDI or any goods or services sold by
21 JDI under or in connection with its Marks, and any marks similar thereto, that are not
22 responsive to any other request contained herein.

23 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
24 Statement and General Objections as though set forth in full herein. In addition to the general
25 reservations, objections and responses stated above, Defendant objects to this Request on the
26 grounds that (1) it is vague, overly broad and/or unduly burdensome; (2) it seeks categories of

1 documents that are that are equally available to Plaintiff through publicly accessible records;
2 (3) it seeks categories of documents that are not available to Defendant.

3 **REQUEST NO. 20:** All documents not otherwise specified herein that relate to, bear
4 upon, or provide evidence concerning any of the allegations in JDI's Complaint, the allegations
5 in Your Answer and Affirmative Defenses, or the information provided in Your Initial
6 Disclosures.

7 **RESPONSE:** Defendant refers to and incorporates by reference her Preliminary
8 Statement and General Objections as though set forth in full herein. In addition to the general
9 reservations, objections and responses stated above, Defendant objects to this Request on the
10 grounds that (1) it is vague, overly broad and/or unduly burdensome; and (2) it seeks categories
11 of documents that are that are equally available to Plaintiff through publicly accessible records.
12 Subject to and without waiving her objections, Defendant will produce all non-privileged,
13 responsive documents at a mutually agreeable time at the offices of Defendant's Counsel of
14 Record.

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DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 11

GARVEY SCHUBERT BARER
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206 464 3939

1 DATED this 12th day of May, 2017.

2 GARVEY SCHUBERT BARER

3 By /s/ John B. Crosetto
4 John B. Crosetto, WSBA #36667

5 GARVEY SCHUBERT BARER
6 1191 Second Avenue, Suite 1800
7 Seattle, WA 98101-3438
Telephone: (206) 464-3939
Facsimile: (206) 464-0125
Email: jcrosetto@gsblaw.com

8 Attorneys for Defendant
9 Heidi Yoast

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DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 12

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CERTIFICATE OF SERVICE

The undersigned declares and states as follows:

I am a citizen of the United States, over the age of 18 years, not a party to the above-referenced matter, and am competent to be a witness.

On May 12, 2017, I electronically served the following document(s):

RESPONSES AND OBJECTIONS TO DEFENDANT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS

to all associated counsel of record.

I also served said documents in the manner set forth below on the following parties:

Rodney L. Umberger, WSBA #24948
Daniel J. Velloth, WSBA #44379
WILLIAMS, KASTNER & GIBBS, PLLC
601 Union Street, Suite 4100
Seattle, WA 98101-2380
Telephone: 206/628-6600
Fax: 206/628-6611
rumberger@williamskastner.com
dvelloth@williamskastner.com
Attorneys for Plaintiff

- Via U.S. Mail*
- Via Facsimile Transmission*
- Via Email*
- By USDC Western District
EM/ECF Filing System*
- Via Hand-Delivery*

Brian T. McKernan, NE #22174
McGRATH NORTH MULLIN & KRATZ, PC LLO
Suite 3700 First National Tower
1601 Dodge Street
Omaha, Nebraska 68102
Telephone: 402/341-3070
Fax: 402/952-6896
bmckernan@mcgrathnorth.com

- Via U.S. Mail*
- Via Facsimile Transmission*
- Via Email*
- By USDC Western District
EM/ECF Filing System*
- Via Hand-Delivery*

Attorneys for Plaintiff Job's Daughters International

I declare under penalty of perjury according to the laws of the State of Washington that the above statements are true and correct.

SIGNED at Seattle, Washington this 12 day of May, 2017.

/s/ Christopher Elliott

Printed name: Christopher Elliott
Legal Support Assistant

GSB:8646264.1

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS - 13

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206 464 3939

Pink Power Printing

Invoice

10525 SE 229th Pl
Kent, WA 98031

Date	Invoice #
2/1/2014	142461

Bill To
Bethel 43

Ship To

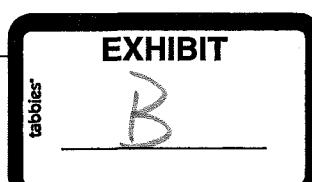


EXHIBIT B - 1

YOAST-00003191

Pink Power Printing

10525 SE 229th Pl
Kent, WA 98031

Invoice

Date	Invoice #
2/1/2014	142462

Bill To
Bethel 27

Ship To

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
Quantity	Item Code	Description			Price Each	Amount
10	Small				12.00	120.00T
8	Medium				12.00	96.00T
6	Large				12.00	72.00T
2	XL				12.00	24.00T
2	2XL				15.00	30.00T
3	3X				15.00	45.00T
-1	Shirt	discount			30.00	-30.00T
		Sales Tax			8.90%	31.77
					Total	\$388.77

Pink Power Printing

10525 SE 229th Pl
Kent, WA 98031

Invoice

Date	Invoice #
2/1/2014	142463

Bill To
Bethel 67 Donna H

Ship To

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
Quantity	Item Code	Description			Price Each	Amount
7	Small				14.50	101.50T
6	Medium				14.50	87.00T
4	Large				14.50	58.00T
9	XL				14.50	130.50T
2	2XL				17.50	35.00T
1	3X				17.50	17.50T
4	Medium				12.00	48.00T
2	2XL				15.00	30.00T
		Sales Tax			8.90%	45.17
					Total	\$552.67

INVOICE

Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Fax: 425 310-6093
pinkpowerprinting@Gmail.com

Paid

Invoice #: 1167
Invoice date: Feb 25, 2014
Due date: Feb 25, 2014

Amount due:
\$30.50

Bill To:

Tamarakaddatz@yahoo.com

Description	Quantity	Price	Amount
Triquetra Purple Jobie Hoodie Lg	1	\$25.00	\$25.00
	Subtotal		\$25.00
	Shipping		\$5.50
	Total		\$30.50 USD
	Amount paid		-\$0.00
	Amount due		\$30.50 USD

INVOICE

Pink Power Printing

Heidi Pink
23149 SE 184th ST
maple Valley, WA 98038
United States

Fax: 425 310-6093
pinkpowerprinting@gmail.com

Paid

Invoice #: 1171
Invoice date: Mar 13, 2014
Due date: Mar 13, 2014

Amount due:
\$75.35

Bill To:

tamarakaddatz@yahoo.com

Description	Quantity	Price	Amount
1 PHQ custom Med Hoodie	1	\$35.00	\$35.00
1 Med Celtic Hoodie	1	\$25.00	\$25.00
		Subtotal	\$60.00
		Shipping	\$10.00
		Sales Tax (8.9%)	\$5.35
		Total	\$75.35 USD
		Amount paid	-\$0.00
		Amount due	\$75.35 USD



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Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com

Invoice #: 1176
Invoice date: Mar 29, 2014
Reference: SB Shirts
Due date: Mar 29, 2014

Amount due:
\$96.85

Bill To:

dhoellering@hotmail.com

Description	Quantity	Price	Amount
SB T-Shirt Sm	1	\$19.00	\$19.00
SB Polo Sm	1	\$27.50	\$27.50
SB Hoodie Sm	1	\$38.00	\$38.00
		Subtotal	\$84.50
		Shipping	\$12.35
		Total	\$96.85 USD
		Amount paid	-\$0.00
		Amount due	\$96.85 USD



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Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1177
Invoice date: Mar 29, 2014
Reference: SB Shirts
Due date: Mar 29, 2014

Amount due:
\$19.00

Bill To:

heather_rose2ca@yahoo.com

Description	Quantity	Price	Amount
SB T-Shirt Med	1	\$19.00	\$19.00
		Subtotal	\$19.00
		Shipping	\$0.00
		Total	\$19.00 USD
		Amount paid	-\$0.00
		Amount due	\$19.00 USD

Terms and Conditions

Pick-Up at Supreme Session



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Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1178
Invoice date: Mar 29, 2014
Reference: SB shirts
Due date: Mar 29, 2014

Amount due:
\$77.85

Bill To:

klairebear100@gmail.com

Description	Quantity	Price	Amount
SB Polo Lg	1	\$27.50	\$27.50
SB Hoodie Lg	1	\$38.00	\$38.00
		Subtotal	\$65.50
		Shipping	\$12.35
		Total	\$77.85 USD
		Amount paid	-\$0.00
		Amount due	\$77.85 USD



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1179
Invoice date: Mar 29, 2014
Reference: SB Shirts
Due date: Mar 29, 2014

Amount due:
\$57.00

Bill To:

the_a_team.horn@icloud.com

Description	Quantity	Price	Amount
SB Polo Med	1	\$27.50	\$27.50
SB Polo 2xl	1	\$29.50	\$29.50
		Subtotal	\$57.00
		Shipping	\$0.00
		Total	\$57.00 USD
		Amount paid	-\$0.00
		Amount due	\$57.00 USD

Notes

2xl - 6xl are an additional \$2.00

Also, I have not included shipping as I am doing my best to send all of Alaska's items in 1 box to help with shipping! All the best!!!



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Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1181
Invoice date: Mar 29, 2014
Reference: SB Shirts
Due date: Mar 29, 2014

Amount due:
\$42.50

Bill To:

princessnatasha27@hotmail.com

Description	Quantity	Price	Amount
SB Polo Med	1	\$27.50	\$27.50
		Subtotal	\$27.50
		Shipping	\$15.00
		Total	\$42.50 USD
		Amount paid	-\$0.00
		Amount due	\$42.50 USD

Terms and Conditions

First Class Intl shipping



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Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1182
Invoice date: Mar 29, 2014
Reference: SB Shirts
Due date: Mar 29, 2014

Amount due:
\$24.75

Bill To:

eagjakse@msn.com

Description	Quantity	Price	Amount
SB T-Shirt Med	1	\$19.00	\$19.00
		Subtotal	\$19.00
		Shipping	\$5.75
		Total	\$24.75 USD
		Amount paid	-\$0.00
		Amount due	\$24.75 USD



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1187
Invoice date: Apr 9, 2014
Due date: Apr 9, 2014

Amount due:
\$27.50

Bill To:

giovanna.lima9@gmail.com

Description	Quantity	Price	Amount
Med Polo	1	\$27.50	\$27.50
		Subtotal	\$27.50
		Shipping	\$0.00
		Total	\$27.50 USD
		Amount paid	-\$0.00
		Amount due	\$27.50 USD

Terms and Conditions

Pick Up at Supreme Session :)



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Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1188
Invoice date: Apr 22, 2014
Due date: Apr 22, 2014

Amount due:
\$107.50

Bill To:

1601 S Mullen
Tacoma, WA 98405
United States

lorriebrunson@yahoo.com

Description	Quantity	Price	Amount
Bags & SB Polo	1	\$107.50	\$107.50
		Subtotal	\$107.50
		Shipping	\$0.00
		Total	\$107.50 USD
		Amount paid	-\$0.00
		Amount due	\$107.50 USD



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1189
Invoice date: Apr 22, 2014
Due date: Apr 22, 2014

Amount due:
\$43.75

Bill To:

P.O. Box 1911
Colfax, CA 95713
United States

wrenfamily5@gmail.com

Description	Quantity	Price	Amount
Supreme Bethel Hoodie Small	1	\$38.00	\$38.00
		Subtotal	\$38.00
		Shipping	\$5.75
		Total	\$43.75 USD
		Amount paid	-\$0.00
		Amount due	\$43.75 USD



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Heidi Pink
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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1192
Invoice date: Apr 28, 2014
Due date: Apr 28, 2014

Amount due:
\$33.25

Bill To:

3821 Cumberland parkway
VIRGINIA BCH, VA 23452
United States

fmc42@live.com

Description	Quantity	Price	Amount
SB Polo Large	1	\$27.50	\$27.50
		Subtotal	\$27.50
		Shipping	\$5.75
		Total	\$33.25 USD
		Amount paid	-\$0.00
		Amount due	\$33.25 USD



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1193
Invoice date: May 5, 2014
Due date: May 5, 2014

Amount due:
\$149.10

Bill To:

kimimock@hotmail.com

Description	Quantity	Price	Amount
Medium MWJD Ladies cut T	3	\$14.99	\$44.97
Large MWJD Ladies cut T	4	\$14.99	\$59.96
2XL MWJD Ladies cut T	2	\$15.99	\$31.98
		Subtotal	\$136.91
		Shipping	\$0.00
		Sales Tax (8.9%)	\$12.19
		Total	\$149.10 USD
		Amount paid	-\$0.00
		Amount due	\$149.10 USD

Terms and Conditions

9 Contestant Ladies cut Black T's Front Crest Logo with Name & Back Miss Washington Job's Daughter Contestant



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
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Home of Got Jobies & Got Rainbow

Invoice #: 1194
Invoice date: May 5, 2014
Due date: May 5, 2014

Amount due:
\$44.25

Bill To:

ksiojd@yahoo.com

Description	Quantity	Price	Amount
GBHQ Kansas!! Small Hoodie	1	\$38.50	\$38.50
		Subtotal	\$38.50
		Shipping	\$5.75
		Total	\$44.25 USD
		Amount paid	-\$0.00
		Amount due	\$44.25 USD



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1195
Invoice date: May 19, 2014
Due date: May 19, 2014

Amount due:
\$626.18

Bill To:

kferlet@gmail.com

Description	Quantity	Price	Amount
Custom Bethel T-shirt 2XL-4XL	14	\$17.50	\$245.00
Custom Bethel T-shirt Sm-XL	22	\$15.00	\$330.00
		Subtotal	\$575.00
		Shipping	\$0.00
		Sales Tax (8.9%)	\$51.18
		Total	\$626.18 USD
		Amount paid	-\$0.00
		Amount due	\$626.18 USD

Terms and Conditions

This invoice does not reflect shipping charges. Shipping will be determined when order is ready to ship.



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Pink Power Printing

Heidi Pink
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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1196
Invoice date: May 19, 2014
Due date: May 19, 2014

Amount due:
\$239.55

Bill To:

kferlet@gmail.com

Description	Quantity	Price	Amount
GGC Eternity Knot Hoodie Purple sm-xl +name	3	\$30.00	\$90.00
GGC Eternity Knot Hoodie Purple 2xl-3xl +name	2	\$35.00	\$70.00
GGC Eternity Knot Long Sleeve T sm-xl +name	3	\$19.99	\$59.97
		Subtotal	\$219.97
		Shipping	\$0.00
		Sales Tax (8.9%)	\$19.58
		Total	\$239.55 USD
		Amount paid	-\$0.00
		Amount due	\$239.55 USD

Terms and Conditions

This order will be shipped with the previous Bethel Order :)



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Pink Power Printing

Heidi Pink
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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1197
Invoice date: May 22, 2014
Due date: May 22, 2014

Amount due:
\$50.75

Bill To:

ajensen.tf@gmail.com

Description	Quantity	Price	Amount
PGBHQ Hoodie IDAHO 2007-2008 Medium	1	\$45.00	\$45.00
		Subtotal	\$45.00
		Shipping	\$5.75
		Total	\$50.75 USD
		Amount paid	-\$0.00
		Amount due	\$50.75 USD



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
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Home of Got Jobies & Got Rainbow

Invoice #: 1198
Invoice date: May 22, 2014
Due date: May 22, 2014

Amount due:
\$45.00

Bill To:

rose.reagan@comcast.net

Description	Quantity	Price	Amount
PGBHQ Hoodie WA Large w/name	1	\$45.00	\$45.00
		Subtotal	\$45.00
		Shipping	\$0.00
		Total	\$45.00 USD
		Amount paid	-\$0.00
		Amount due	\$45.00 USD



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Pink Power Printing

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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1199
Invoice date: May 22, 2014
Due date: May 22, 2014

Amount due:
\$45.00

Bill To:

tracyedickinson@gmail.com

Description	Quantity	Price	Amount
XL PGBHQ Hoodie WA W/name	1	\$45.00	\$45.00
		Subtotal	\$45.00
		Shipping	\$0.00
		Total	\$45.00 USD
		Amount paid	-\$0.00
		Amount due	\$45.00 USD

Terms and Conditions

Delivered by Jennifer Ford @ GS :)



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Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1200
Invoice date: May 22, 2014
Due date: May 22, 2014

Amount due:
\$45.00

Bill To:

4022 northwest ave apt 104
Bellingham, WA 98226
United States

Msld13@gmail.com

Description	Quantity	Price	Amount
Small PGBHQ Hoodie WA w/name	1	\$45.00	\$45.00
		Subtotal	\$45.00
		Shipping	\$0.00
		Total	\$45.00 USD
		Amount paid	-\$0.00
		Amount due	\$45.00 USD

Terms and Conditions

Delivered by Jennifer Ford at GS



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Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1201
Invoice date: May 22, 2014
Due date: May 22, 2014

Amount due:
\$48.50

Bill To:

eeeyoresr11@comcast.net

Description	Quantity	Price	Amount
3xl PGBHQ Hoodie WA w/name 2xl-6xl (43.50)	1	\$48.50	\$48.50
		Subtotal	\$48.50
		Shipping	\$0.00
		Total	\$48.50 USD
		Amount paid	-\$0.00
		Amount due	\$48.50 USD



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Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1202
Invoice date: May 24, 2014
Due date: May 24, 2014

Amount due:
\$85.00

Bill To:

6238 sunset Ave ne
BREMERTON, WA 98311
United States

Jenn69chevy@gmail.com

Description	Quantity	Price	Amount
PGBHQ Hoodie w/Name	1	\$45.00	\$45.00
Hawk Pretty Girl Hoodie	1	\$40.00	\$40.00
	Subtotal		\$85.00
	Shipping		\$0.00
	Total		\$85.00 USD
	Amount paid		-\$0.00
	Amount due		\$85.00 USD



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1203
Invoice date: May 28, 2014
Due date: May 28, 2014

Amount due:
\$45.00

Bill To:

rodandnancy@wavecable.com

Description	Quantity	Price	Amount
PGBHQ Hoodie Lg 1998-1999 w/Name	1	\$45.00	\$45.00
		Subtotal	\$45.00
		Shipping	\$0.00
		Total	\$45.00 USD
		Amount paid	-\$0.00
		Amount due	\$45.00 USD

Terms and Conditions

Pick up through Jennifer Ford at Grand Session



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23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1205
Invoice date: May 29, 2014
Due date: May 29, 2014

Amount due:
\$45.00

Bill To:

susanlatte@aol.com

Description	Quantity	Price	Amount
PGBHQ Hoodie w/Name & year	1	\$45.00	\$45.00
		Subtotal	\$45.00
		Shipping	\$0.00
		Total	\$45.00 USD
		Amount paid	-\$0.00
		Amount due	\$45.00 USD



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Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1208
Invoice date: Jun 10, 2014
Due date: Jun 10, 2014

Amount due:
\$50.00

Bill To:

tracyedickinson@gmail.com

Description	Quantity	Price	Amount
PMWJD Full Zip	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD



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Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1210
Invoice date: Jun 15, 2014
Reference: MWJD
Due date: Jun 15, 2014

Amount due:
\$50.00

Bill To:

erickaadorning@gmail.com

Description	Quantity	Price	Amount
MWJD ZIP-UP Large	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

Terms and Conditions

Your item will be delivered to you at Grand Session



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Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@Gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1211
Invoice date: Jun 15, 2014
Due date: Jun 15, 2014

Amount due:
\$50.00

Bill To:

20101 14th ave ne
shoreline, WA 98155
United States

kimimock@hotmail.com

Description	Quantity	Price	Amount
MWJD ZIP-Up Small	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

Terms and Conditions

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23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1212
Invoice date: Jun 15, 2014
Due date: Jun 15, 2014

Amount due:
\$50.00

Bill To:

11524 10th ave ct e g105
Tacoma, WA 98445
United States

lilshellebell@gmail.com

Description	Quantity	Price	Amount
MWJD ZIP-UP XL	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

Terms and Conditions

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23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@Gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1213
Invoice date: Jun 15, 2014
Due date: Jun 15, 2014

Amount due:
\$50.00

Bill To:

2207 E 56th Ave
#6
Anchorage, AK 99507
United States

breanna.wilbur@tapfin.com

Description	Quantity	Price	Amount
MWDJ ZIP-UP XL	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

Terms and Conditions

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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1215
Invoice date: Jun 15, 2014
Due date: Jun 15, 2014

Amount due:
\$50.00

Bill To:

jessica.e.kinney@gmail.com

Description	Quantity	Price	Amount
MWJD ZIP-UP Small	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

Terms and Conditions

Your item will be delivered to you at Grand Session



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Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1215
Invoice date: Jun 15, 2014
Due date: Jun 15, 2014

Amount due:
\$50.00

Bill To:

Jessica.e.kinney@gmail.com

Description	Quantity	Price	Amount
MWJD ZIP-UP Small	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

Terms and Conditions

Your item will be delivered to you at Grand Session



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Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 1217
Invoice date: Jun 15, 2014
Due date: Jun 15, 2014

Amount due:
\$50.00

Bill To:

leanndra_1996@comcast.net

Description	Quantity	Price	Amount
MWDJ ZIP-UP XL	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

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Invoice #: 1219
Invoice date: Jun 15, 2014
Due date: Jun 15, 2014

Amount due:
\$50.00

Bill To:

judy1906@gmail.com

Description	Quantity	Price	Amount
MWJD ZIP-UP Medium	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

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Invoice #: 1221
Invoice date: Jun 20, 2014
Due date: Jun 20, 2014

Amount due:
\$45.00

Bill To:

rick.rendt@yahoo.com

Description	Quantity	Price	Amount
Small PGBHQ Hoodie Med w/Name	1	\$45.00	\$45.00
		Subtotal	\$45.00
		Shipping	\$0.00
		Total	\$45.00 USD
		Amount paid	-\$0.00
		Amount due	\$45.00 USD



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pinkpowerprinting@Gmail.com
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Invoice #: 1222
Invoice date: Jun 21, 2014
Due date: Jun 21, 2014

Amount due:
\$50.00

Bill To:

9001 N Rosebury
SPOKANE, WA 99208
United States

oliviarae515@yahoo.com

Description	Quantity	Price	Amount
Past MWJD ZIP-UP	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

Terms and Conditions

Item to be delivered at Grand Session



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pinkpowerprinting@gmail.com
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Invoice #: 1225
Invoice date: Jun 27, 2014
Due date: Jun 27, 2014

Amount due:
\$55.00

Bill To:

brooklynmarie_08@yahoo.com

Description	Quantity	Price	Amount
PGBHQ Zip-Up Lg Arizona 2008-2009	1	\$55.00	\$55.00
		Subtotal	\$55.00
		Shipping	\$0.00
		Total	\$55.00 USD
		Amount paid	-\$0.00
		Amount due	\$55.00 USD

Notes

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Invoice #: 1226
Invoice date: Jun 27, 2014
Due date: Jun 27, 2014

Amount due:
\$50.00

Bill To:

doeglass@hotmail.com

Description	Quantity	Price	Amount
MWJD Zip-Up Lg 2014-2015 Ashley	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

Terms and Conditions

Woot woot Go Ashley!!!



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pinkpowerprinting@gmail.com
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Invoice #: 1227
Invoice date: Jun 28, 2014
Due date: Jun 28, 2014

Amount due:
\$50.00

Bill To:

kimberly.furgason@hotmail.com

Description	Quantity	Price	Amount
PGBHQ Alberta 2012-2013 Lg	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00 USD
		Amount paid	-\$0.00
		Amount due	\$50.00 USD

Terms and Conditions

To be delivered at Supreme Session! :)



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pinkpowerprinting@gmail.com
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Invoice #: 1231
Invoice date: Jul 3, 2014
Due date: Jul 3, 2014

Amount due:
\$60.45

Bill To:

ETW7@aol.com

Description	Quantity	Price	Amount
Miss Missouri Job's Daughter Hoodie Sm	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$6.00
		Sales Tax (8.9%)	\$4.45
		Total	\$60.45 USD
		Amount paid	-\$0.00
		Amount due	\$60.45 USD



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Invoice #: 1232
Invoice date: Jul 15, 2014
Due date: Jul 15, 2014

Amount due:
\$155.13

Bill To:

tetontoys@cableone.net

Description	Quantity	Price	Amount
Supreme Bethel T Med	1	\$19.00	\$19.00
Large Purple 2/side 2 sleeve + hood Hoodie Lg.	1	\$65.00	\$65.00
Med Purple 2/side 2/sleeve +hood Hoodie	1	\$60.00	\$60.00
		Subtotal	\$144.00
		Shipping	\$0.00
		Sales Tax (8.9%)	\$11.13
		Total	\$155.13 USD
		Amount paid	-\$0.00
		Amount due	\$155.13 USD



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pinkpowerprinting@gmail.com
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Invoice #: 1233
Invoice date: Jul 15, 2014
Due date: Jul 15, 2014

Amount due:
\$203.64

Bill To:

susanlatte@aol.com

Description	Quantity	Price	Amount
Bethel No. 22 T's	11	\$17.00	\$187.00
		Subtotal	\$187.00
		Shipping	\$0.00
		Sales Tax (8.9%)	\$16.64
		Total	\$203.64 USD
		Amount paid	-\$0.00
		Amount due	\$203.64 USD



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pinkpowerprinting@gmail.com
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Invoice #: 1234
Invoice date: Jul 16, 2014
Due date: Jul 16, 2014

Amount due:
\$100.00

Bill To:

reganhiroko@gmail.com

Description	Quantity	Price	Amount
Med PGBHQ Hoodie	1	\$50.00	\$50.00
Med Miss BC Hoodie	1	\$50.00	\$50.00
		Subtotal	\$100.00
		Shipping	\$0.00
		Total	\$100.00 USD
		Amount paid	-\$0.00
		Amount due	\$100.00 USD

Terms and Conditions

Supreme Session Pick-Up :)



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pinkpowerprinting@gmail.com
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Invoice #: 1235
Invoice date: Jul 21, 2014
Due date: Jul 21, 2014

Amount due:
\$38.00

Bill To:

9715 94th ave
Fort Saskatchewan Alberta T8L 1P1
Canada

britany_prochnau@hotmail.ca

Description	Quantity	Price	Amount
SB Hoodie Lg	1	\$38.00	\$38.00
		Subtotal	\$38.00
		Shipping	\$0.00
		Total	\$38.00 USD
		Amount paid	-\$0.00
		Amount due	\$38.00 USD

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Maple Valley, WA 98038
United States

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pinkpowerprinting@gmail.com
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Invoice #: 1236
Invoice date: Jul 21, 2014
Due date: Jul 21, 2014

Amount due:
\$46.50

Bill To:

dhoellering@hotmail.com

Description	Quantity	Price	Amount
SB Polo Med	1	\$27.50	\$27.50
SB T-shirt med	1	\$19.00	\$19.00
		Subtotal	\$46.50
		Shipping	\$0.00
		Total	\$46.50 USD
		Amount paid	-\$0.00
		Amount due	\$46.50 USD

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pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
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Invoice #: 1241
Invoice date: Jul 28, 2014
Due date: Jul 28, 2014

Amount due:
\$542.34

Bill To:

9715 94th ave
Fort Saskatchewan Alberta T8L 1P1
Canada

britany_prochnau@hotmail.ca

Description	Quantity	Price	Amount
Bethel No. 1 Crew Neck White crew neck T sm-xl (purple ink +glitter)	5	\$12.00	\$60.00
Bethel No. 1 Crew Neck White crew neck T 2xl (purple ink +glitter)	1	\$14.00	\$14.00
Bethel No. 1 V Neck White v neck T sm-xl (purple ink +glitter)	2	\$14.00	\$28.00
Bethel No. 13 Crew Neck White crew neck T sm-xl (purple ink +glitter)	11	\$12.00	\$132.00
Bethel No. 13 Crew Neck White crew neck T 2xl (purple ink +glitter)	1	\$14.00	\$14.00
Bethel No. 13 V Neck White v neck T sm-xl (purple ink +glitter)	3	\$14.00	\$42.00
Bethel No. 18 Crew Neck White crew neck T sm-xl (purple ink +glitter)	2	\$12.00	\$24.00
Bethel No. 23 Crew Neck White crew neck T sm-xl (purple ink +glitter)	6	\$12.00	\$72.00
Bethel No. 23 V Neck White v neck T sm-xl (purple ink +glitter)	2	\$14.00	\$28.00
Crew Neck White crew neck T sm-xl (purple ink +glitter)	6	\$12.00	\$72.00
Crew Neck DeMolay Lg Custom	1	\$12.00	\$12.00

Subtotal	\$498.00
Shipping	\$0.00
Sales Tax (8.9%)	\$44.34
Total	\$542.34 USD
Amount paid	-\$0.00

Amount due \$542.34 USD

Notes

Mrs. Brunson SBG will have your order at the SB table :) Enjoy
Session & ROAR LOUD!!!!

Terms and Conditions

Supreme Pick-Up



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Invoice #: 1242
Invoice date: Aug 15, 2014
Due date: Aug 15, 2014

Amount due:
\$112.50

Bill To:

carmel_bateman@hotmail.com

Description	Quantity	Price	Amount
Med Miss British Columbia Hoodie Kailie/2014-2015	1	\$50.00	\$50.00
Med PGBHQ Hoodie "Honoured" Kailie/2013-2014	1	\$50.00	\$50.00
		Subtotal	\$100.00
		Shipping	\$12.50
		Total	\$112.50 USD
		Amount paid	-\$0.00
		Amount due	\$112.50 USD



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Invoice #: 1244
Invoice date: Aug 15, 2014
Due date: Aug 15, 2014

Amount due:
\$285.00

Bill To:

12529 SE Mall
PORTLAND, OR 97236
United States

nopancreasgirl@yahoo.com

Description	Quantity	Price	Amount
Bethel No. 1 Daughters T (2 sides + sleeve/ heat pressed)	19	\$15.00	\$285.00
		Subtotal	\$285.00
		Shipping	\$0.00
		Total	\$285.00 USD
		Amount paid	-\$0.00
		Amount due	\$285.00 USD

Terms and Conditions

Delivered July 16th 2014



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pinkpowerprinting@Gmail.com
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Invoice #: 1245
Invoice date: Aug 17, 2014
Due date: Aug 17, 2014

Amount due:
\$0.00

Bill To:

lorriebrunson@yahoo.com

Description	Quantity	Price	Amount
29 Cinch Sacks	29	\$6.50	\$188.50
SB Hoodie	1	\$50.00	\$50.00
5 Grand Line T's	1	\$75.00	\$75.00
Subtotal			\$313.50
Shipping			\$0.00
Total			\$313.50
Amount paid			-\$313.50
Amount due			\$0.00 USD



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pinkpowerprinting@Gmail.com
www.PinkPowerPrinting.com
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Invoice #: 1249
Invoice date: Aug 28, 2014
Due date: Aug 28, 2014

Amount due:
\$0.00

Bill To:

60 Spring Creek drive
Townsend, DE 19734
United States

erica.murrellpace@yahoo.com

Description	Quantity	Price	Amount
Custom Miss Delaware Hoodie Med	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$8.00
		Total	\$58.00
		Amount paid	-\$58.00
		Amount due	\$0.00 USD



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pinkpowerprinting@gmail.com
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Invoice #: 1251
Invoice date: Aug 28, 2014
Due date: Aug 28, 2014

Amount due:
\$0.00

Bill To:

11801 ne 136th st
liberty, MO 64068
United States

the.flanerys@sbcglobal.net

Description	Quantity	Price	Amount
PGBHQ Hoodie Lg 2005-2006 Andie (Flanery) Moon Smile often... Just for the fun of it	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$5.95
		Total	\$55.95
		Amount paid	-\$55.95
		Amount due	\$0.00 USD



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Invoice #: 1253
Invoice date: Sep 8, 2014
Due date: Sep 8, 2014

Amount due:
\$0.00

Bill To:

onehappyrose@gmail.com

Description	Quantity	Price	Amount
13 T-shirts (1 color youth cut)	13	\$15.00	\$195.00
		Subtotal	\$195.00
		Shipping	\$13.00
		Total	\$208.00
		Amount paid	-\$208.00
		Amount due	\$0.00 USD



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pinkpowerprinting@Gmail.com
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Invoice #: 1254
Invoice date: Sep 9, 2014
Due date: Sep 9, 2014

Amount due:
\$0.00

Bill To:

drn4jdi@gmail.com

Description	Quantity	Price	Amount
Custom CAV T-shirt (Med)	1	\$25.00	\$25.00
Custom CAV Hoodie (Med)	1	\$50.00	\$50.00
Custom CAV Tote Bag	1	\$25.00	\$25.00
		Subtotal	\$100.00
		Shipping	\$0.00
		Total	\$100.00
		Amount paid	-\$100.00
		Amount due	\$0.00 USD

Terms and Conditions

T-shirt in the mail & Hoodie & Tote to follow this week :)



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Invoice #: 1256
Invoice date: Sep 12, 2014
Due date: Sep 12, 2014

Amount due:
\$0.00

Bill To:

8 hunter rd
New castle, DE 19720
United States

Karolynoliver@aol.com

Description	Quantity	Price	Amount
Custom xl Jr. Miss Delaware Purple Zip-up	1	\$60.00	\$60.00
		Subtotal	\$60.00
		Shipping	\$5.75
		Total	\$65.75
		Amount paid	-\$65.75
		Amount due	\$0.00 USD



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Invoice #: 1257
Invoice date: Sep 24, 2014
Due date: Sep 24, 2014

Amount due:
\$0.00

Bill To:

Srichscrap@yahoo.com

Description	Quantity	Price	Amount
GBHQ Hoodie Lg	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$6.25
		Total	\$56.25
		Amount paid	-\$56.25
		Amount due	\$0.00 USD



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pinkpowerprinting@Gmail.com
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Invoice #: 1260
Invoice date: Oct 10, 2014
Due date: Oct 10, 2014

Amount due:
\$0.00

Bill To:

tara_arreguin@yahoo.com

Description	Quantity	Price	Amount
Med Jr. Miss Zip-Up 2014-2015 Madison	1	\$60.00	\$60.00
		Subtotal	\$60.00
		Shipping	\$5.95
		Total	\$65.95
		Amount paid	-\$65.95
		Amount due	\$0.00 USD



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pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
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Invoice #: 1262
Invoice date: Oct 19, 2014
Due date: Oct 19, 2014

Amount due:
\$0.00

Bill To:

christin0610@gmail.com

Description	Quantity	Price	Amount
Custom PHQ Hoodie Sm	1	\$55.00	\$55.00
		Subtotal	\$55.00
		Shipping	\$5.95
		Total	\$60.95
		Amount paid	-\$60.95
		Amount due	\$0.00 USD



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pinkpowerprinting@gmail.com
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Invoice #: 52440
Invoice date: Nov 27, 2015
Due date: Nov 27, 2015

Amount due:
\$0.00

Bill To:

the.flanerys@sbcglobal.net

Description	Quantity	Price	Amount
Supreme Bethel Officer soft Shell Jacket	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$5.95
		Sales Tax (8.9%)	\$4.45
		Total	\$60.40
		Amount paid	-\$60.40
		Amount due	\$0.00 USD



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pinkpowerprinting@Gmail.com
www.PinkPowerPrinting.com
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Invoice #: 1268
Invoice date: Dec 16, 2014
Due date: Dec 16, 2014

Amount due:
\$0.00

Bill To:

eyoresr11@comcast.net

Description	Quantity	Price	Amount
GBHQ Hoodie 2014-2015	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$0.00
		Total	\$50.00
		Amount paid	-\$50.00
		Amount due	\$0.00 USD



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pinkpowerprinting@gmail.com
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Invoice #: 1270
Invoice date: Dec 17, 2014
Due date: Dec 17, 2014

Amount due:
\$0.00

Bill To:

pchefkennedy@cox.net

Description	Quantity	Price	Amount
Bethel 22 Phoenix, Arizona Shirts	41	\$13.00	\$533.00
18 Bethel 22 Totes	18	\$8.00	\$144.00
		Subtotal	\$677.00
		Shipping	\$0.00
		Total	\$677.00
		Amount paid	-\$677.00
		Amount due	\$0.00 USD

Notes

Don't faint!!! LOL You will get goodies :)



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pinkpowerprinting@gmail.com
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Invoice #: 1286
Invoice date: Feb 18, 2015
Due date: Feb 18, 2015

Amount due:
\$0.00

Bill To:

hidocare@yahoo.com

Description	Quantity	Price	Amount
Sm custom Miss Congeniality Hoodie	1	\$55.00	\$55.00
		Subtotal	\$55.00
		Shipping	\$5.75
		Total	\$60.75
		Amount paid	-\$60.75
		Amount due	\$0.00 USD



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pinkpowerprinting@gmail.com
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Invoice #: 1288
Invoice date: Feb 20, 2015
Due date: Feb 20, 2015

Amount due:
\$0.00

Bill To:

porchiaprince@gmail.com

Description	Quantity	Price	Amount
Ohio Miss Job's Daughter Zip Up	1	\$60.00	\$60.00
		Subtotal	\$60.00
		Shipping	\$5.75
		Total	\$65.75
		Amount paid	-\$65.75
		Amount due	\$0.00 USD



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@Gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 2015-004
Invoice date: Feb 24, 2015
Reference: Jobies
Due date: Feb 24, 2015

Amount due:
\$0.00

Bill To:

15456 Kennewick Bend6
NOBLESVILLE, IN 46062
United States

princessmarkanda@yahoo.com

Description	Quantity	Price	Amount
Miss Indiana Congeniality Small Hot Pink Hoodie 20014-20015	1	\$60.00	\$60.00
		Subtotal	\$60.00
		Shipping	\$5.75
		Total	\$65.75
		Amount paid	-\$65.75
		Amount due	\$0.00 USD



INVOICE

Paid

Pink Power Printing

Heidi Pink
23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@Gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 2015-03
Invoice date: Mar 3, 2015
Reference: Alberta Job's Daughters
Due date: Mar 3, 2015

Amount due:
\$0.00

Bill To:

128 Hidden Valley Manor NW
Calgary Alberta T3A 5V6
Canada

kimberly.furgason@hotmail.com

Description	Quantity	Price	Amount
Ladies L317 Small	5	\$50.00	\$250.00
Ladies L317 Med	10	\$50.00	\$500.00
Ladies L317 Lg	5	\$50.00	\$250.00
Ladies L317 XI	6	\$50.00	\$300.00
Ladies L317 2xl	1	\$55.00	\$55.00
Mens L317 Med	1	\$50.00	\$50.00
Mens L317 XI	2	\$50.00	\$100.00
		Subtotal	\$1,505.00
		Shipping	\$0.00
		Sales Tax (8.9%)	\$133.95
		Total	\$1,638.95
		Amount paid	-\$1,638.95
		Amount due	\$0.00 USD

Notes

All Jackets include a Crest (Left Pocket) Logo & custom sleeve name.

Terms and Conditions

This invoice does not include shipping as we will make sure to find the best possible shipping.



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Invoice #: 2015-04
Invoice date: Mar 9, 2015
Due date: Mar 9, 2015

Amount due:
\$0.00

Bill To:

1800 jarvis ave
ANCHORAGE, AK 99515
United States

Dhoellering@hotmail.com

Description	Quantity	Price	Amount
Miss Alaska Job's Daughter Zip-up	1	\$60.00	\$60.00
		Subtotal	\$60.00
		Shipping	\$0.00
		Total	\$60.00
		Amount paid	-\$60.00
		Amount due	\$0.00 USD



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pinkpowerprinting@gmail.com
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Home of Got Jobies & Got Rainbow

Invoice #: 2016
Invoice date: Apr 28, 2015
Due date: Apr 28, 2015

Amount due:
\$0.00

Bill To:

128 Hidden Valley Manor NW
Calgary Alberta T3A 5V6
Canada

kimberly.furgason@hotmail.com

Description	Quantity	Price	Amount
shipping for 30 jackets to Alberta	1	\$156.89	\$156.89
		Subtotal	\$156.89
		Shipping	\$0.00
		Total	\$156.89
		Amount paid	-\$156.89
		Amount due	\$0.00 USD



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Invoice #: 052416
Invoice date: May 24, 2015
Reference: extra Jackets
Due date: May 24, 2015

Amount due:
\$0.00

Bill To:

128 Hidden Valley Manor NW
Calgary Alberta T3A 5V6
Canada

kimberly.furgason@hotmail.com

Description	Quantity	Price	Amount
Alberta Jackets	4	\$50.00	\$200.00
		Subtotal	\$200.00
		Shipping	\$25.00
		Sales Tax (8.9%)	\$17.80
		Total	\$242.80
		Amount paid	-\$242.80
		Amount due	\$0.00 USD



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www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 052417
Invoice date: Jun 10, 2015
Due date: Jun 10, 2015

Amount due:
\$0.00

Bill To:

susanlatte@aol.com

Description	Quantity	Price	Amount
33 Blk Crew T w/crest logo sm-xl	33	\$12.50	\$412.50
3 Blk Crew T w/crest logo 2xl-4xl	3	\$15.00	\$45.00
		Subtotal	\$457.50
		Shipping	\$153.52
		Sales Tax (8.9%)	\$40.72
		Total	\$651.74
		Amount paid	-\$651.74
		Amount due	\$0.00 USD



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Phone: 425-295-4324
pinkpowerprinting@Gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 052423
Invoice date: Jul 20, 2015
Reference: Bethel 51
Due date: Jul 20, 2015

Amount due:
\$0.00

Bill To:

Heather@percivalcg.com

Description	Quantity	Price	Amount
Pink Camo Bethel T's sm-xl	8	\$10.00	\$80.00
Camo Bethel T 4xl with heat press	1	\$17.00	\$17.00
		Subtotal	\$97.00
		Shipping	\$0.00
		Sales Tax (8.9%)	\$8.63
		Total	\$105.63
		Amount paid	-\$105.63
		Amount due	\$0.00 USD



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Home of Got Jobies & Got Rainbow

Invoice #: 052425
Invoice date: Jul 20, 2015
Due date: Jul 20, 2015

Amount due:
\$0.00

Bill To:

melanie.schoonmaker@gmail.com

Description	Quantity	Price	Amount
Miss JD Hoodie Blk Lg	1	\$60.00	\$60.00
Miss Congeniality Hoodie blue Med	1	\$60.00	\$60.00
		Subtotal	\$120.00
		Shipping	\$8.00
		Total	\$128.00
		Amount paid	-\$128.00
		Amount due	\$0.00 USD



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Home of Got Jobies & Got Rainbow

Invoice #: 052426
Invoice date: Jul 20, 2015
Reference: Bethel No. 22
Due date: Jul 20, 2015

Amount due:
\$0.00

Bill To:

susanlatte@aol.com

Description	Quantity	Price	Amount
Custom Bethel 22. T's LPC54V DT5001 front & back + Glitter	15	\$15.00	\$225.00
		Subtotal	\$225.00
		Shipping	\$12.35
		Total	\$237.35
		Amount paid	-\$237.35
		Amount due	\$0.00 USD



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Invoice #: 52428
Invoice date: Aug 15, 2015
Due date: Aug 15, 2015

Amount due:
\$0.00

Bill To:

3824 e acoma dt
PHOENIX, AZ 85032
United States

cristinenichols@cox.net

Description	Quantity	Price	Amount
Purple w/white Behel 21 Ladies T's sm-xl	14	\$17.00	\$238.00
		Subtotal	\$238.00
		Shipping	\$15.00
		Sales Tax (8.9%)	\$21.18
		Total	\$274.18
		Amount paid	-\$274.18
		Amount due	\$0.00 USD

Notes

Thank you for your business!



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Invoice #: 52430
Invoice date: Sep 17, 2015
Due date: Sep 17, 2015

Amount due:
\$0.00

Bill To:

Kymwhite1@gmail.com

Description	Quantity	Price	Amount
Miss Oregon JD soft shell jacket small	1	\$50.00	\$50.00
		Subtotal	\$50.00
		Shipping	\$15.75
		Total	\$65.75
		Amount paid	-\$65.75
		Amount due	\$0.00 USD



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Invoice #: 52431
Invoice date: Sep 19, 2015
Due date: Sep 19, 2015

Amount due:
\$0.00

Bill To:

bhall@ahcpa.com

Description	Quantity	Price	Amount
Mens sm-xl Polo	5	\$15.00	\$75.00
Mens 2xl-4xl Polo	2	\$18.50	\$37.00
Womens sm-xl Polo	6	\$15.00	\$90.00
Womens 2xl-3xl Polo	4	\$18.50	\$74.00
V-Neck T's sm-xl	10	\$15.00	\$150.00
V-Neck 2xl-4xl	3	\$18.50	\$55.50
Yoga Pants (backorder) sm	1	\$30.00	\$30.00
Tote Bags	3	\$12.00	\$36.00
Varsity Jackets xs-xl (for sizing purposes & will be shipped back for print)	5	\$50.00	\$250.00
Varsity Jackets 2xl-4xl (for sizing purposes & will be shipped back for print)	3	\$55.00	\$165.00

Subtotal	\$962.50
Shipping	\$50.00
Deposit	-\$300.00
Total	\$712.50
Amount paid	-\$712.50
Amount due	\$0.00 USD

Notes

Thank you for working with our little shop in the woods! Jobe Love to you all!!! -Heidi



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@Gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 52434
Invoice date: Sep 21, 2015
Due date: Sep 21, 2015

Amount due:
\$0.00

Bill To:

smmiller2015@gmail.com

Description	Quantity	Price	Amount
Custom Miss Delaware zip-up/Navy	1	\$60.00	\$60.00
	Subtotal		\$60.00
	Shipping		\$5.75
	Total		\$65.75
	Amount paid		-\$65.75
	Amount due		\$0.00 USD



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Phone: 425-295-4324
pinkpowerprinting@gmail.com
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Home of Got Jobies & Got Rainbow

Invoice #: 52436
Invoice date: Nov 4, 2015
Due date: Nov 4, 2015

Amount due:
\$0.00

Bill To:

Larivimm@aol.com

Description	Quantity	Price	Amount
Ohio No. 7 Bethel T	2	\$10.00	\$20.00
Ohio No. 7 Bethel T DM106L	1	\$12.00	\$12.00
Ohio No. 7 Bethel T w/names	7	\$10.00	\$70.00
		Subtotal	\$102.00
		Shipping	\$10.00
		Sales Tax (8.9%)	\$9.08
		Total	\$121.08
		Amount paid	-\$121.08
		Amount due	\$0.00 USD

Terms and Conditions

Thank you!



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United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
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Home of Got Jobies & Got Rainbow

Invoice #: 52437
Invoice date: Nov 4, 2015
Due date: Nov 4, 2015

Amount due:
\$0.00

Bill To:

the.flanerys@sbcglobal.net

Description	Quantity	Price	Amount
3 White/Purple Glitter font November Ball sashes	3	\$35.00	\$105.00
		Subtotal	\$105.00
		Shipping	\$5.75
		Sales Tax (8.9%)	\$9.35
		Total	\$120.10
		Amount paid	-\$120.10
		Amount due	\$0.00 USD



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United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 52442
Invoice date: Dec 14, 2015
Due date: Dec 14, 2015

Amount due:
\$0.00

Bill To:

bhall@ahcpa.com

Description	Quantity	Price	Amount
Custom Varsity Jackets 3 small, 1 med, 1 Lg, 1 XL	6	\$50.00	\$300.00
Tote Bag with Emblem	3	\$12.00	\$36.00
V-Neck T 3xl	2	\$18.50	\$37.00
Ladies Polo small	2	\$15.00	\$30.00
Ladies Polo 4xl	1	\$18.50	\$18.50
Pocket logo names & title	3	\$5.00	\$15.00
		Subtotal	\$436.50
		Shipping	\$0.00
		Total	\$436.50
		Amount paid	-\$436.50
		Amount due	\$0.00 USD

Notes

If it is possible a deposit would be truly appreciated :) Also, due to the crazy shipping issues I will be taking care of the shipping cost.



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Pink Power Printing

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23149 se 184th st
Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 52451
Invoice date: Mar 8, 2016
Due date: Mar 8, 2016

Amount due:
\$0.00

Bill To:

bhall@ahcpa.com

Description	Quantity	Price	Amount
Keep Calm Mini Session T-shirt sm-xl	61	\$15.00	\$915.00
Keep Calm Mini Session T-shirt 2xl-4xl	16	\$17.00	\$272.00
Keep Calm Mini Session T-shirt Crew sm-xl	10	\$15.00	\$150.00
Keep Calm Mini Session T-shirt Crew 2xl-4xl	8	\$17.00	\$136.00
Varsity Jackets	6	\$50.00	\$300.00
3xl Polo	1	\$18.50	\$18.50
Sm Polo	1	\$15.00	\$15.00
	Subtotal		\$1,806.50
	Shipping		\$40.00
	Total		\$1,846.50
	Amount paid		-\$1,846.50
	Amount due		\$0.00 USD



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Maple Valley, WA 98038
United States

Phone: 425-295-4324
pinkpowerprinting@gmail.com
www.PinkPowerPrinting.com
Home of Got Jobies & Got Rainbow

Invoice #: 52454
Invoice date: Apr 28, 2016
Due date: Apr 28, 2016

Amount due:
\$0.00

Bill To:

bhall@ahcpa.com

Description	Quantity	Price	Amount
XI Ladies Polo	1	\$15.00	\$15.00
Varsity Jacket	2	\$50.00	\$100.00
Varsity Jacket 3xl	1	\$55.00	\$55.00
	Subtotal		\$170.00
	Shipping		\$15.00
	Total		\$185.00
	Amount paid		-\$185.00
	Amount due		\$0.00 USD



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Home of Got Jobies & Got Rainbow

Invoice #: 52463
Invoice date: Jun 13, 2016
Due date: Jun 13, 2016

Amount due:
\$0.00

Bill To:

Kferlet@gmail.com

Description	Quantity	Price	Amount
Red Polo with heat pressed logo + name/title Medium Kerrie Ferlet, PHQ, PBG Missouri Grand Guardian 2016-17	1	\$20.00	\$20.00
Red Polo with heat pressed logo + name/title Small Becca Hairer, PHQ Grand Bethel Honored Queen	1	\$20.00	\$20.00
Red Polo with heat pressed logo + name/title XL Randy Davis, PABG Associate Grand Guardian	1	\$20.00	\$20.00

Subtotal	\$60.00
Shipping	\$0.00
Total	\$60.00
Amount paid	-\$60.00
Amount due	\$0.00 USD



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Phone: 425-295-4324
pinkpowerprinting@gmail.com
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Home of Got Jobies & Got Rainbow

Invoice #: 52464
Invoice date: Jun 13, 2016
Due date: Jun 13, 2016

Amount due:
\$0.00

Bill To:

Kerrie.Ferlet@health.mo.gov

Description	Quantity	Price	Amount
GGC Officer Polo Ash Jersey Knit Small	3	\$20.00	\$60.00
GGC Officer Polo Ash Jersey Knit Medium	6	\$20.00	\$120.00
GGC Officer Polo Ash Jersey Knit Large	6	\$20.00	\$120.00
GGC Officer Polo Ash Jersey Knit X-Large	3	\$20.00	\$60.00
GGC Officer Polo Ash Jersey Knit 2XL	1	\$20.00	\$20.00
GGC Officer Polo Ash Jersey Knit 3XL	3	\$20.00	\$60.00
		Subtotal	\$440.00
		Shipping	\$0.00
		Total	\$440.00
		Amount paid	-\$440.00
		Amount due	\$0.00 USD

Notes

Jacket invoice will be sent separate. Shipping will be invoiced once rate and weight are established.



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Invoice #: 52469
Invoice date: Jul 2, 2016
Due date: Jul 2, 2016

Amount due:
\$0.00

Bill To:

alexisannerbell0726@icloud.com

Description	Quantity	Price	Amount
Miss Idaho Job's Daughter 2016-2017 Hoodie Lg. Logo on front name on back	1	\$55.00	\$55.00
		Subtotal	\$55.00
		Shipping	\$0.00
		Total	\$55.00
		Amount paid	-\$55.00
		Amount due	\$0.00 USD

Notes

Pick Up at Grand Assembly :)

1 Hon. Robert S. Lasnik
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9
10 UNITED STATES DISTRICT COURT
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12 WESTERN DISTRICT OF WASHINGTON
13 AT SEATTLE
14

15 JOB'S DAUGHTERS INTERNATIONAL,
16

17 Plaintiff,

18 v.

19 HEIDI YOAST,

20 Defendant.

21 NO. 16-CV-01573-RSL
22

23 **NOTICE OF DEPOSITION OF JOB'S
24 DAUGHTERS INTERNATIONAL
PURSUANT TO FED. R. CIV. P.
30(B)(6)**

25 PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6) and 45, Defendant
26 will take the deposition, upon oral examination, of Job's Daughters International ("JDI"), to be
recorded by stenographic means, at the offices of Williams Kastner, located at Two Union
Square, 601 Union Street, Seattle, Washington 98101. JDI is requested to designate the person
or persons most knowledgeable and prepared to testify on behalf of JDI concerning the subject
matter described in JDI's Complaint against Ms. Heidi Yoast filed on October 6, 2016. The
deposition(s) will commence at 9:00 a.m. on December 19, 2017. If necessary, the deposition
will be adjourned until completed.

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1 DATED this 20th day of November, 2017.
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4 By /s/ Patricia I. Forman
5

6 Patricia I. Forman, Esq.
7 *Admitted pro hac vice*
8 California SBN #245108

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10 Burbank, California 91505
11 Telephone: (213) 509-8708
12 Email: patriciaforman@gmail.com

13 Attorney for Defendant
14 Heidi Yoast
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DEPOSITION NOTICE

PATRICIA I. FORMAN, ESQ.
931 N Maple Street, Ste 104
Burbank, California 91505
(213) 509-8708
patriciaforman@gmail.com

CERTIFICATE OF SERVICE

The undersigned declares and states as follows:

I am a citizen of the United States, over the age of 18 years, not a party to the above-referenced matter, and am competent to be a witness.

On _____, 2016, I electronically served the following document(s):

DEFENDANT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS

to all associated counsel of record.

I also served said documents in the manner set forth below on the following parties:

Rodney L. Umberger, WSBA #24948
Daniel J. Velloth, WSBA #44379
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Attorneys for Plaintiff

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- Via Facsimile Transmission*
- Via Email*
- By USDC Western District
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- Via Hand-Delivery*

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- Via U.S. Mail*
- Via Facsimile Transmission*
- Via Email*
- By USDC Western District
EM/ECF Filing System*
- Via Hand-Delivery*

Attorneys for Plaintiff Job's Daughters International

I declare under penalty of perjury according to the laws of the State of Washington that the above statements are true and correct.

SIGNED at Burbank, California this 20th day of November, 2017.

/s/ Patricia Forman
Printed name: Patricia Forman

DEPOSITION NOTICE

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1 The Honorable Robert S. Lasnik
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5
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7 UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

8 JOB'S DAUGHTERS INTERNATIONAL,

9 Plaintiff, NO. 16-cv-1573-RSL
10 v.
11 HEIDI YOAST,
12 Defendant.

13 HEIDI YOAST,
14 Counterclaim-Plaintiff,
15 v.
16 JOB'S DAUGHTERS INTERNATIONAL,
SHELLY COLE aka SHELLY HOWRIGON,
17 an individual, ROD REID, an individual,
18 Counterclaim-Defendants.

19

20 15:19-22
21 34:18-20
22 35:5-35:22
23 38:25-39:7
24 40:5-40:20
25 65:3-5
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**SUSAN GOOLSBY DEPOSITION
DESIGNATIONS IN SUPPORT OF
PLAINTIFF'S BRIEF IN OPPOSITION
TO DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

1 81:23-83:16
2 85:7-85:25
3 87:17-87:25
4 138:3-138:8
5 Exhibit 20
6 Exhibit 42
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PLAINTIFF'S BRIEF IN OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT
(16-cv-1573-RSL)

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

3 JOB'S DAUGHTERS INTERNATIONAL,) NO.
4 Plaintiff,) 16-CV-01573-RSL
5 vs.)
6 HEIDI YOAST,) TAKEN ON BEHALF
7 Defendant.) OF DEFENDANT

8 APPEARANCES:

9 Mr. Brian T. McKernan For Plaintiff
Attorney at Law
10 MCGRATH NORTH MULLIN & KRATZ
Suite 3700 First National Tower
11 1601 Dodge Street
Omaha, NE 68102

12 Ms. Patricia I. Forman For Defendant
13 Attorney at Law
931 N. Maple Street, Suite 104
14 Burbank, CA 91505
(Via videoconference)

15
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17
18 DEPOSITION OF SUSAN GOOLSBY,
19 424 East Fifth Street, Papillion, Nebraska,
20 taken at 10:56 a.m. on January 31st, 2018, by
21 Shannon L. Brack, RPR, CRR, CSR, and General
22 Notary Public in and for the State of Nebraska,
23 at 1601 Dodge Street, Suite 3700, Omaha, Nebraska.

24
25

THIBAULT, SUHR & THIBAULT, INC.
Omaha, Nebraska (402) 331-2500

EXHIBIT INDEX			
3	Ex. No.	Pg. No.	Ref. Description
4	12	16	Image of Job's Daughters Logo Ties Printed from Global Neckwear Marketing
5	13	18	E-mail Chain dated October 2016 (JDI_000130)
6	14	20	Image of a Gold Job's Daughters Ring Printed From Macy.com
7	15	21	Scrapbook.com Documents
8	16	22	Job's Daughters Car Auto Emblem (JDA-1) Printed From eBay
9	17	23	Images Printed from the Spreen Fraternal Supply Web Site
10	18	25	The Masonic Exchange Documents
11	19	31	Presentation Screen Shots
12	20	35	Letter from Kathleen Wierhorst to Heidi Yoast dated 12/30/15 (JDI_000058 - JDI_000059)
13	21	39	Letter from Heidi Yoast to Shelly dated 8/11/16 (JDI_001477 - JDI_001479)
14	22	41	Miss Minnesota Job's Daughter Pageant 2011 Image
15	23	43	Job's Daughters Bethel No. 51 Tumwater, WA Image
16	24	45	Arizona Bethel No. 22 Job's Daughters Image
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<p>DIRECT - GOOLSBY (Forman) 13</p> <p>1 MR. MCKERNAN: I'm just going to 2 object to the extent that this is outside the 3 scope of the 30(b)(6). You can answer these 4 questions in your individual capacity, but this is 5 outside the scope of the 30(b)(6) notice that 6 she's here today on. Go ahead.</p> <p>7 A. Would you ask the question again, 8 please?</p> <p>9 Q. Sure. The question was, does JDI 10 offer its trademark liaisons any training?</p> <p>11 A. Not that I'm aware of.</p> <p>12 Q. Do you have any involvement with the 13 certified adult volunteer or youth protection 14 program?</p> <p>15 A. Yes.</p> <p>16 Q. And what's that involvement?</p> <p>17 A. Well, first of all, I helped to write 18 it. Secondly, my office manages every aspect of 19 our CAV and YPP program.</p> <p>20 Q. Other than this litigation, has JDI 21 ever been involved in any other trademark 22 litigation?</p> <p>23 A. No. Oh, excuse me. I, I should have 24 said -- that's, that's wrong. Years ago we were 25 involved with Lindeburg, but that was prior to me</p> <p> THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 14</p> <p>1 being a part of, of Job's Daughters International 2 office.</p> <p>3 Q. Are you aware of any claim ever filed 4 against JDI by Harley-Davidson?</p> <p>5 A. Yes.</p> <p>6 Q. Do you recall which year that took 7 place in?</p> <p>8 A. No, I'm sorry, I don't.</p> <p>9 Q. Do you recall which state that claim 10 was filed in?</p> <p>11 A. Yes, it was in Kansas. It wasn't 12 actually a lawsuit. They simply sent us a letter 13 saying cease and desist.</p> <p>14 Q. So it's your recollection that 15 Harley-Davidson only sent you a cease and desist 16 letter?</p> <p>17 A. Correct.</p> <p>18 Q. In your official capacity as executive 19 director of JDI, are you involved in JDI's web 20 sites or social media presence?</p> <p>21 A. In the sense that the webmaster is one 22 of my employees in the office, and I have 23 instructions for her to place things on the web 24 site. Our social media director is currently 25 living in Australia, and she is a volunteer.</p> <p> THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>
<p>DIRECT - GOOLSBY (Forman) 15</p> <p>1 Q. Which web site domains does JDI 2 currently own?</p> <p>3 MR. MCKERNAN: Again, I'm going to 4 object just outside the scope. You can answer.</p> <p>5 A. We own IOJD, and we own Job's 6 Daughters International -- not Job's Daughters. 7 Excuse me. Job's -- oh, Job's International, I 8 think is what it is.</p> <p>9 Q. Can you tell me the name of your 10 webmaster?</p> <p>11 A. Kylie Holman, K-Y-L-I-E H-O-L-M-A-N.</p> <p>12 Q. Would she have all of the information 13 regarding when the web sites were updated and 14 changed?</p> <p>15 MR. MCKERNAN: Objection, scope and 16 foundation. Go ahead.</p> <p>17 A. Yes, she would. When she came to work 18 for the office, she was placed in that position.</p> <p>19 Q. Are there any other paid positions in 20 the JDI offices that you oversee?</p> <p>21 A. Yes, there are. I have one full-time 22 employee and two part-time employees.</p> <p>23 Q. Are there any social media sites that 24 are official JDI social media pages or groups that 25 you know of?</p> <p> THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 16</p> <p>1 A. We have the official Job's Daughters 2 International web site. I believe there's a 3 presence on Twitter, though I'm not a part of that 4 to, to tell you what it exactly is. And we have 5 our Facebook page that's run by our social media 6 director, and our web site. That's it that I know 7 of.</p> <p>8 Q. Have you ever heard of a company -- 9 strike that.</p> <p>10 Do you ever review web sites or images 11 submitted to you that might have trademark 12 infringements against the JDI trademarks?</p> <p>13 MR. MCKERNAN: Object to form, 14 scope, and foundation. Go ahead.</p> <p>15 A. When I'm informed of an infringement, 16 possible infringement, I sometimes look at it 17 before forwarding it off to our trademark liaison 18 on the board.</p> <p>19 MS. FORMAN: So I'd like to go ahead 20 and bring in our first exhibit, which I think 21 should be marked as 12. It's an image.</p> <p>22 (Deposition Exhibit Number 12 was 23 marked for identification.)</p> <p>24 MR. MCKERNAN: All right. I'm 25 handing the witness what's been marked as</p> <p> THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>

<p>DIRECT - GOOLSBY (Forman) 33</p> <p>1 meeting?</p> <p>2 A. No.</p> <p>3 Q. Are official minutes taken from the business meetings?</p> <p>4 A. No.</p> <p>5 Q. Did you receive any type of communication from a Leslie Hoglund, L-E-S-L-I-E H-O-G-L-U-N-D, regarding Shelly Cole's presentation or behavior at supreme session in 2016?</p> <p>6 MR. McKERNAN: Object to scope. Go ahead.</p> <p>7 A. I don't recall.</p> <p>8 Q. Are you aware of any video or recording circulating on social media of this business meeting?</p> <p>9 A. Not that I'm aware of.</p> <p>10 Q. Are you aware of any social media live streams that were taken by anybody present?</p> <p>11 A. I know that they had requested people not to live stream because of protection of the daughters. However, I'm not aware of any.</p> <p>12 Q. Do you know if there was WiFi signal provided to the JDI members in attendance during this business meeting?</p> <p>13 THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 34</p> <p>1 MR. McKERNAN: Scope and foundation.</p> <p>2 Go ahead.</p> <p>3 A. I know in the newer section of the hotel -- it was a beautiful hotel -- the WiFi was present because that's where we held our board of trustees meetings prior to the actual supreme session. But in the older section of the hotel, I know I didn't have it in my room.</p> <p>4 Q. Was the older section of the hotel mostly guest rooms?</p> <p>5 MR. McKERNAN: Scope and foundation and form. Go ahead.</p> <p>6 A. No. Actually it was -- it was a basic old hotel that had meeting rooms on the bottom and the first several floors. There was a Starbucks down below, I remember that. And then sleeping rooms up, I believe, over the fourth floor.</p> <p>7 Q. Okay. Do you know if Job's Daughters International has ever sent a cease and desist letter to Heidi Yoast?</p> <p>8 A. Yes.</p> <p>9 Q. Do you know how many?</p> <p>10 A. I believe there were two from Kathy Wiekhorst, possibly three.</p> <p>11 Q. Do you know who the third would have</p> <p>12 THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>
<p>DIRECT - GOOLSBY (Forman) 35</p> <p>1 been from?</p> <p>2 A. Our attorney.</p> <p>3 MS. FORMAN: Let's introduce</p> <p>4 Exhibit 20.</p> <p>5 (Deposition Exhibit Number 20 was</p> <p>6 marked for identification.)</p> <p>7 MR. McKERNAN: Exhibit 20 is in</p> <p>8 front of the witness.</p> <p>9 Q. Please review, and let me know when</p> <p>10 that's complete.</p> <p>11 A. I'm done.</p> <p>12 Q. Prior to today, have you seen this</p> <p>13 cease and desist letter?</p> <p>14 A. Yes.</p> <p>15 Q. Do you know how this cease and desist</p> <p>16 letter was delivered to Heidi Yoast?</p> <p>17 MR. McKERNAN: Objection, scope and</p> <p>18 foundation. Go ahead.</p> <p>19 A. I believe this was the second letter</p> <p>20 that Kathy sent, Kathy Wiekhorst, and she told me</p> <p>21 that she sent it to the address that was on</p> <p>22 Heidi's social media page.</p> <p>23 Q. In your experience as the executive of</p> <p>24 JDI, does the trademark liaison typically record</p> <p>25 every cease and desist letter they send out?</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 36</p> <p>1 MR. McKERNAN: Scope, foundation.</p> <p>2 Go ahead.</p> <p>3 A. Well, in my experience, we ask them to</p> <p>4 do that. But they're all volunteers, and so some</p> <p>5 are better than others in keeping track of the</p> <p>6 information. But we ask that they make a list of</p> <p>7 those that are sent, and that list is normally</p> <p>8 given to the board at the end of the term.</p> <p>9 Q. Do you recall if Kathy Wiekhorst gave</p> <p>10 you a -- or gave JDI a trademark liaison report</p> <p>11 for term year 2015-2016?</p> <p>12 MR. McKERNAN: Scope. Go ahead.</p> <p>13 A. Without looking at it, I'm not sure.</p> <p>14 But I know Kathy was very good at keeping records,</p> <p>15 so I would imagine we'd have something.</p> <p>16 Q. Does the JDI executive office keep</p> <p>17 evidence of mailing of cease and desist letters?</p> <p>18 MR. McKERNAN: Scope. Go ahead.</p> <p>19 A. Generally, no.</p> <p>20 Q. Whose responsibility is it to send out</p> <p>21 cease and desist letters?</p> <p>22 A. The trademark liaison for the board.</p> <p>23 Q. During the business meeting that we</p> <p>24 were previously speaking about, do you recall if</p> <p>25 Shelly Cole spoke of anybody receiving cease and</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>

<p>DIRECT - GOOLSBY (Forman) 37</p> <p>1 desist letters or other correspondence regarding 2 trademarks during that business meeting?</p> <p>3 MR. MCKERNAN: Scope. Go ahead.</p> <p>4 A. Not that I'm aware of.</p> <p>5 Q. Do you recall during that business 6 meeting if Shelly Cole spoke about any vendors 7 that she felt were violating JDI trademarks?</p> <p>8 MR. MCKERNAN: Scope. Go ahead.</p> <p>9 A. No. What she spoke about was strictly 10 what we were going to do with the proposed 11 amendment.</p> <p>12 Q. Did anybody else in that meeting that 13 you recall talk about any vendors they felt were 14 violating JDI trademarks?</p> <p>15 MR. MCKERNAN: Scope and foundation. 16 Go ahead.</p> <p>17 A. I don't believe so. But it was a very 18 big room, so someone could have been speaking in 19 the back of the room.</p> <p>20 Q. Did you ever contact Heidi Yoast to 21 discuss issues related to this litigation?</p> <p>22 A. No, I did not.</p> <p>23 Q. Before JDI initiates legal action, 24 aside from any privileged discussions that JDI or 25 the board of trustees might have with their THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 38</p> <p>1 attorneys, what kinds of due diligence or 2 investigations does the board or your office 3 undertake?</p> <p>4 MR. MCKERNAN: Form and scope. Go 5 ahead, subject to the caveat I don't want you to 6 get into any discussions that you had with me or 7 any previous counsel --</p> <p>8 THE WITNESS: All right.</p> <p>9 MR. MCKERNAN: -- in terms of 10 initiating legal action. If you want to speak 11 generally about whether or not you do, I think 12 she's entitled to know that, but don't get into 13 any conversations you would have had with, with 14 counsel either on this matter or any previous 15 matters you may have been -- litigation matters 16 you may have been involved in.</p> <p>17 A. I guess the question you asked is what 18 our normal procedure would be?</p> <p>19 Q. Correct.</p> <p>20 A. Okay. Well, this is not something we 21 normally do, so it's not something I could respond 22 what our normal procedure would be. Definitely we 23 would discuss it on a -- to try everything we 24 could to avoid legal action.</p> <p>25 Q. In this case, again, subject to the THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>
<p>DIRECT - GOOLSBY (Forman) 39</p> <p>1 caveat please don't get into any privileged 2 information, what kinds of actions did you take to 3 avoid this litigation?</p> <p>4 MR. MCKERNAN: Scope. Go ahead.</p> <p>5 A. Cease and desist letters, and I know 6 our chairman at the time attempted to contact 7 Heidi personally.</p> <p>8 MS. FORMAN: Let's introduce 9 Exhibit 21.</p> <p>10 (Deposition Exhibit Number 21 was 11 marked for identification.)</p> <p>12 MR. MCKERNAN: Sorry. Exhibit 21 is 13 in front of the witness.</p> <p>14 Q. Please review, and let me know when 15 you've completed that.</p> <p>16 A. I'm familiar with this document.</p> <p>17 Q. Okay. You've seen this document before?</p> <p>18 A. Yes, I have.</p> <p>19 Q. Did it -- to the best of your knowledge, did anybody on the board of trustees call Heidi Yoast after receiving this letter?</p> <p>20 MR. MCKERNAN: Scope and foundation. Go ahead.</p> <p>21 A. I don't know that.</p> <p>22 THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 40</p> <p>1 Q. Do you know if anybody e-mailed Heidi 2 Yoast after receiving this letter?</p> <p>3 MR. MCKERNAN: Scope, foundation. Go ahead.</p> <p>4 A. Well, I know that during that time 5 frame we were trying to get Heidi to take down our 6 trademark, but I couldn't tell you the date 7 sequence. This follows August 11th. I can't tell 8 you exactly what the dates were for other 9 communications.</p> <p>10 Q. You said you were at the time trying 11 to get Heidi to take down your trademark or JDI's 12 trademark. Other than the cease and desist 13 letters you've already discussed, what actions 14 were you taking?</p> <p>15 MR. MCKERNAN: Form, scope, foundation. Go ahead.</p> <p>16 A. Like I said before, Rod Reid being 17 from the same jurisdiction, he attempted to 18 contact Heidi personally.</p> <p>19 Q. Do you know if he ever actually made 20 contact with Heidi?</p> <p>21 MR. MCKERNAN: Same objections.</p> <p>22 A. He would have -- I believe he told us 23 that he was not able to make connection.</p> <p>24 THIBAULT, SUHR & THIBAULT, INC. 25 Omaha, Nebraska (402) 331-2500</p>

<p>DIRECT - GOOLSBY (Forman) 65</p> <p>1 et cetera, to make JDI-related items?</p> <p>2 MR. MCKERNAN: Scope and form. Go</p> <p>3 ahead.</p> <p>4 A. We used to have a contracted vendor in</p> <p>5 California by the name of Walters Jewelry.</p> <p>6 Q. Any other vendors that you know of?</p> <p>7 A. Not that I'm aware of.</p> <p>8 MR. MCKERNAN: Same objections.</p> <p>9 Sorry.</p> <p>10 A. I must say, too, that Walters was only</p> <p>11 able to sell jewelry items in the state of</p> <p>12 California.</p> <p>13 Q. To the best of your knowledge, while</p> <p>14 you have been with JDI, has a vendor other than</p> <p>15 Doc Morgan or Walters ever directly asked JDI or</p> <p>16 the board of trustees for permission to make</p> <p>17 goods?</p> <p>18 MR. MCKERNAN: Scope and foundation.</p> <p>19 Go ahead.</p> <p>20 A. Yes.</p> <p>21 Q. Can you tell me who those were?</p> <p>22 A. Oh, now you're really taxing my</p> <p>23 memory. There was a place in Oklahoma -- I can't</p> <p>24 tell you the name, and this goes back a number of</p> <p>25 years -- that had requested to be our official</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 66</p> <p>1 jeweler. At the time we had a contract with DMI,</p> <p>2 Doc Morgan, Incorporated. The other requests,</p> <p>3 they come in, you know, different times.</p> <p>4 Q. Were those requests granted?</p> <p>5 A. No, because we have a contract with</p> <p>6 DMI.</p> <p>7 MS. FORMAN: Let's look at</p> <p>8 Exhibit 37.</p> <p>9 (Deposition Exhibit Number 37 was</p> <p>10 marked for identification.)</p> <p>11 MR. MCKERNAN: Exhibit 37 is in</p> <p>12 front of the witness.</p> <p>13 Q. Please review, and let me know when</p> <p>14 that's completed.</p> <p>15 A. Ready for you.</p> <p>16 Q. Do you recall this letter at all?</p> <p>17 A. It's not familiar to me, no.</p> <p>18 Q. In your opinion, is this still an</p> <p>19 accurate statement of JDI's policy?</p> <p>20 MR. MCKERNAN: Scope, form,</p> <p>21 foundation. Go ahead.</p> <p>22 A. In this -- in the fact that it says we</p> <p>23 still have a contract, yes. There is a little bit</p> <p>24 more leeway than we had in 2006 when this was</p> <p>25 written.</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>
<p>DIRECT - GOOLSBY (Forman) 67</p> <p>1 Q. Can you tell me what you mean by "more</p> <p>2 leeway"?</p> <p>3 A. As we've been talking about on the</p> <p>4 other photos of items, the legislation that was</p> <p>5 passed in 2016 gives the bethels the ability to</p> <p>6 make items without having to request permission.</p> <p>7 But this was asking for permission to make the</p> <p>8 embroidered kits, I believe they were, and because</p> <p>9 we had a contract with DMI, we were not able to</p> <p>10 grant this.</p> <p>11 Q. Are bethels entitled to use JDI</p> <p>12 trademarks for items that are for promotional use</p> <p>13 only?</p> <p>14 MR. MCKERNAN: Scope and form. Go</p> <p>15 ahead.</p> <p>16 A. Yes.</p> <p>17 Q. Was that the case prior to 2016?</p> <p>18 MR. MCKERNAN: Scope. Go ahead.</p> <p>19 A. They could use it, but not without</p> <p>20 permission.</p> <p>21 Q. Can you tell me what, in your opinion,</p> <p>22 promotional use means?</p> <p>23 MR. MCKERNAN: Scope. Go ahead.</p> <p>24 A. My opinion would be promotional</p> <p>25 brochures or flyers or banners.</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 68</p> <p>1 MS. FORMAN: Let's introduce</p> <p>2 Exhibit 38.</p> <p>3 (Deposition Exhibit Number 38 was</p> <p>4 marked for identification.)</p> <p>5 MR. MCKERNAN: Exhibit 38 is in</p> <p>6 front of the witness.</p> <p>7 Q. Please read this, and let me know when</p> <p>8 that's complete.</p> <p>9 A. I'm ready.</p> <p>10 Q. Can you tell me who Cindi Marvel is?</p> <p>11 A. Cindi was our trademark liaison last</p> <p>12 year.</p> <p>13 Q. And in your opinion, does she have</p> <p>14 permission to grant or deny -- strike that.</p> <p>15 In your opinion, does she have authority</p> <p>16 to grant or deny permission for use of JDI</p> <p>17 trademarks?</p> <p>18 MR. MCKERNAN: Scope. Go ahead.</p> <p>19 A. Yes.</p> <p>20 Q. In your opinion, would the board of</p> <p>21 trustees typically follow the interpretation of a</p> <p>22 JDI law that's written by a trademark liaison?</p> <p>23 MR. MCKERNAN: Scope, form,</p> <p>24 foundation. Go ahead.</p> <p>25 A. Say that again, please.</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>

<p>DIRECT - GOOLSBY (Forman) 81</p> <p>1 to get through to Heidi, and there was no communication.</p> <p>3 Q. Would the board of trustees have voted on a resolution to pursue legal action?</p> <p>5 MR. MCKERNAN: Objection to scope.</p> <p>6 Go ahead.</p> <p>7 A. Yes.</p> <p>8 Q. Would there be meeting minutes from that meeting?</p> <p>10 A. No. I believe it was held as a conference call.</p> <p>12 Q. Would anybody have taken minutes at that meeting?</p> <p>14 A. I generally jot things down.</p> <p>16 Q. Are those recorded somewhere?</p> <p>18 A. Yes, I have them recorded.</p> <p>20 Q. Are they filed in the JDI corporate offices?</p> <p>22 A. Yes.</p> <p>24 MS. FORMAN: Look at Exhibit 42. (Deposition Exhibit Number 42 was marked for identification.)</p> <p>26 MR. MCKERNAN: Exhibit 42 is in front of the witness.</p> <p>28 THE WITNESS: Ready.</p> <p>29 THIBAULT, SUHR & THIBAULT, INC.</p> <p>30 Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 82</p> <p>1 Q. Okay. Have you ever seen this statement before?</p> <p>3 A. Yes, I have.</p> <p>5 Q. Did Rod ever tell you that he went or tried to go to Heidi Yoast's house?</p> <p>6 A. Yes, he told the entire board that.</p> <p>8 Q. Can you tell me what else he said about that attempt to visit Heidi Yoast's property?</p> <p>10 A. I really don't believe he said too much more than what was right here in this document.</p> <p>12 Q. Do you recall if he mentioned speaking to Heidi Yoast's husband at that visit to Heidi Yoast's house?</p> <p>14 A. Yes.</p> <p>16 Q. Can you tell me what was said?</p> <p>18 A. No, I can't other than what's in here.</p> <p>20 MR. MCKERNAN: And just for the record, when you say "what's in here," you mean Exhibit 42?</p> <p>22 THE WITNESS: Yes, in Exhibit 42 --</p> <p>24 MR. MCKERNAN: Okay.</p> <p>26 THE WITNESS: -- what he has stated.</p> <p>28 MR. MCKERNAN: Okay.</p> <p>29 THIBAULT, SUHR & THIBAULT, INC.</p> <p>30 Omaha, Nebraska (402) 331-2500</p>
<p>DIRECT - GOOLSBY (Forman) 83</p> <p>1 Q. Do you recall anything about Rod's interaction with Heidi Yoast's husband from that conversation he had in front of the board or with the board of trustees?</p> <p>3 A. I don't remember anything else, no.</p> <p>5 Q. Did Rod Reid, spelled R-E-I-D, ever tell you or the board of trustees when you were present that he called Heidi Yoast to discuss trademark issues?</p> <p>7 A. Yes, he did.</p> <p>9 Q. Can you tell me what he said?</p> <p>11 A. Here again, it's what he had in this document, 42.</p> <p>13 Q. Do you know if Rod ever actually talked to Heidi Yoast?</p> <p>15 A. I don't believe he did.</p> <p>17 Q. Do you know what date this statement was written?</p> <p>19 A. No, I don't. I'm sorry.</p> <p>21 Q. Do you know if anybody else on the board of trustees ever attempted to call Heidi Yoast?</p> <p>23 MR. MCKERNAN: Scope and foundation.</p> <p>25 Go ahead.</p> <p>27 A. I don't know for sure.</p> <p>28 THIBAULT, SUHR & THIBAULT, INC.</p> <p>29 Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 84</p> <p>1 Q. Do you know who Susan Mentel, M-E-N-T-E-L, is?</p> <p>3 A. Yes, Susie Mentel, she used to be on our board of trustees. She's also a past supreme guardian.</p> <p>5 Q. Can you tell me what year she served on the board of trustees?</p> <p>7 A. Oh, wow. No, I can't. Without looking at, at, you know, a calendar or document, no, I couldn't tell you. I want to say it's --</p> <p>9 Q. Is that information --</p> <p>11 A. It would be in our directory.</p> <p>13 Q. Do you recall what year Susan Mentel was supreme guardian?</p> <p>15 A. 2002-2003, I think.</p> <p>17 Q. Do you know which positions on the board of trustees she held?</p> <p>19 A. No, I would have to look. I do know that she was trademark liaison for a while. I don't know if that was all of her three years on the board.</p> <p>21 Q. To your knowledge, did she have any training or background in intellectual property?</p> <p>23 MR. MCKERNAN: Scope and foundation.</p> <p>25 Go ahead.</p> <p>27 THIBAULT, SUHR & THIBAULT, INC.</p> <p>28 Omaha, Nebraska (402) 331-2500</p>

<p>DIRECT - GOOLSBY (Forman) 85</p> <p>1 A. Not that I know of.</p> <p>2 Q. To your knowledge, did JDI offer her</p> <p>3 any training for her position on the board of</p> <p>4 trustees.</p> <p>5 MR. MCKERNAN: Scope and foundation.</p> <p>6 A. No.</p> <p>7 Q. In your position as executive for JDI,</p> <p>8 are you acquainted with merchandise or other items</p> <p>9 that JDI might sell either through -- either</p> <p>10 directly through JDI or through one of its supreme</p> <p>11 arrangements committees?</p> <p>12 A. I usually don't get into that. That's</p> <p>13 left up to the SACs to do, supreme arrangements</p> <p>14 committees.</p> <p>15 Q. Do you know if JDI or its SAC</p> <p>16 committees, supreme arrangements committees, sell</p> <p>17 merchandise with the JDI trademarks on them?</p> <p>18 A. Yes.</p> <p>19 MR. MCKERNAN: Scope and form.</p> <p>20 Q. What kind of items would that be?</p> <p>21 A. Oh, it varies. There's so many</p> <p>22 different things, from water bottles or cups,</p> <p>23 T-shirts. I have a -- one of those PopSockets on</p> <p>24 my phone that has JDI on it. It's just -- it</p> <p>25 varies from little things to big things.</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 86</p> <p>1 Q. Does JDI collect sales tax on its</p> <p>2 sales?</p> <p>3 MR. MCKERNAN: Scope, foundation.</p> <p>4 Go ahead.</p> <p>5 A. On sales directly from the office, but</p> <p>6 we don't do any of the SAC sales. Those are left</p> <p>7 up to the SAC committees to take care of, and they</p> <p>8 must adhere to the tax laws of whatever state that</p> <p>9 they're in.</p> <p>10 Q. Do you know -- strike that.</p> <p>11 Are you ever involved with the</p> <p>12 preparation of JDI's tax returns, federal or</p> <p>13 state?</p> <p>14 MR. MCKERNAN: Scope. You can</p> <p>15 answer.</p> <p>16 A. Yes.</p> <p>17 Q. Does JDI report the profit and loss of</p> <p>18 their merchandise on their federal or state tax</p> <p>19 returns?</p> <p>20 MR. MCKERNAN: Scope and form. Go</p> <p>21 ahead.</p> <p>22 A. No, because it's not ours. We hardly</p> <p>23 do any kind of sales anymore. The sales that we</p> <p>24 would do were robes or capes or forms, and all of</p> <p>25 our forms are now online, and so there's very,</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>
<p>DIRECT - GOOLSBY (Forman) 87</p> <p>1 very little that we do. We do pay Nebraska sales</p> <p>2 tax if it's on items that, that we must pay sales</p> <p>3 tax on.</p> <p>4 Q. Do you know if there's a line item</p> <p>5 budget for advertising JDI merchandise in JDI's</p> <p>6 annual fiscal budget?</p> <p>7 MR. MCKERNAN: Scope. Go ahead.</p> <p>8 A. No, there isn't.</p> <p>9 Q. Does JDI spend any money advertising</p> <p>10 its merchandise?</p> <p>11 MR. MCKERNAN: Scope and form. Go</p> <p>12 ahead.</p> <p>13 A. Again, because it's not actually JDI</p> <p>14 that's selling these items, it's the SACs that are</p> <p>15 selling, that would be left up to them as far as</p> <p>16 advertising their individual supreme session.</p> <p>17 Q. Who is the official vendor for JDI</p> <p>18 trademark merchandise?</p> <p>19 A. Doc Morgan, Incorporated, DMI.</p> <p>20 Q. How long has DMI been the official</p> <p>21 vendor?</p> <p>22 A. Oh, gosh. I don't know when they</p> <p>23 began, but let me say in all the years I've been</p> <p>24 working at the office, they have been the official</p> <p>25 vendor, so that's 40-plus years.</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - GOOLSBY (Forman) 88</p> <p>1 Q. Do you remember which year you started</p> <p>2 working at the office?</p> <p>3 A. Oh, definitely. It was 1977. I was</p> <p>4 only going to work for the summer.</p> <p>5 Q. That's a long summer.</p> <p>6 A. Yeah, it is.</p> <p>7 MR. MCKERNAN: You need a new</p> <p>8 calendar.</p> <p>9 Q. Do you know if JDI has any standard</p> <p>10 for the products that Doc Morgan makes under its</p> <p>11 JD license or contract?</p> <p>12 A. Yes.</p> <p>13 MR. MCKERNAN: Scope and form.</p> <p>14 Sorry.</p> <p>15 A. Yes, we do.</p> <p>16 THE WITNESS: I'm sorry. I keep</p> <p>17 jumping in there.</p> <p>18 A. Yes, we have a contract with DMI, and</p> <p>19 they have to keep up their quality. We ask that</p> <p>20 anyone that has issues with their products contact</p> <p>21 the jewelry liaison on the board of trustees. And</p> <p>22 then twice a year a representative from DMI,</p> <p>23 either Pam Bierman or Rod Miller, will meet with</p> <p>24 the board and go over any new items or problems</p> <p>25 with old items, that type of thing.</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>

<p>CROSS - GOOLSBY (McKernan) 137</p> <p>1 restrictive, when was that change made?</p> <p>2 A. 2015-'16. There again, I'd have to</p> <p>3 look.</p> <p>4 Q. Okay. Are majority members subject to</p> <p>5 SI-3?</p> <p>6 A. Yes.</p> <p>7 Q. Did that change that was made in 2015</p> <p>8 or '16 change whether or not a majority member</p> <p>9 would be subject to SI-3?</p> <p>10 A. No.</p> <p>11 Q. Again, you were shown a number of</p> <p>12 exhibits with respect to individuals that were</p> <p>13 requesting permission to utilize trademarks or</p> <p>14 slogans on various goods. Do you recall that?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And they seemed -- are you</p> <p>21 aware of any of those exhibits that you were shown</p> <p>22 where it seemed people were requesting permission</p> <p>23 after the fact, or was permission being requested</p> <p>24 before certain items were generated or created?</p> <p>25 A. It was generally prior to --</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>CROSS - GOOLSBY (McKernan) 138</p> <p>1 Q. Okay.</p> <p>2 A. -- making any items.</p> <p>3 Q. As you sit here today as the executive</p> <p>4 manager of JDI, do you have any knowledge of Heidi</p> <p>5 Yoast ever seeking any type of permission from JDI</p> <p>6 to utilize any JDI trademarks?</p> <p>7 A. Not through -- not through my office</p> <p>8 or through the liaison.</p> <p>9 Q. Okay. You were asked some</p> <p>10 questions -- is it your belief that JDI reached</p> <p>11 out to Ms. Yoast prior to filing the present</p> <p>12 lawsuit?</p> <p>13 A. Yes.</p> <p>14 Q. And did JDI, other than a letter from</p> <p>15 their counsel which you were shown as Exhibit 55,</p> <p>16 ever receive a response from Ms. Yoast?</p> <p>17 A. We received the letter from her</p> <p>18 attorney, but not directly from Ms. Yoast.</p> <p>19 Q. Right. And I think your testimony was</p> <p>20 it's your belief there were at least two cease and</p> <p>21 desist letters that were sent?</p> <p>22 A. Yes.</p> <p>23 Q. And no response received from</p> <p>24 Ms. Yoast?</p> <p>25 A. Correct.</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>
<p>CROSS - GOOLSBY (McKernan) 139</p> <p>1 Q. There was an attempt by the then</p> <p>2 president of the board, Rod Reid, to contact</p> <p>3 Ms. Yoast?</p> <p>4 A. Yes.</p> <p>5 Q. And that attempt to reach out to</p> <p>6 Ms. Yoast was rebuked by her husband?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. Do you believe JDI attempted in</p> <p>9 good faith on multiple occasions to discuss their</p> <p>10 objections with Ms. Yoast prior to filing the</p> <p>11 current lawsuit?</p> <p>12 A. Yes, we attempted to.</p> <p>13 Q. Okay. And then you were asked some</p> <p>14 questions, and you were asked if JDI ever received</p> <p>15 a response to the cease and desist, and I think</p> <p>16 you said your lawyers received Exhibit 56?</p> <p>17 A. Correct.</p> <p>18 Q. And you brought up a point that I just</p> <p>19 want to make sure my notes are clear. Was it</p> <p>20 JDI's position that Exhibit 56 or the response</p> <p>21 from Ms. Yoast's lawyer was, go pound sand, we're</p> <p>22 going to keep doing what we're doing?</p> <p>23 A. That's the way this reads to me.</p> <p>24 Q. Okay. So -- okay. This is the first</p> <p>25 lawsuit JDI has had to file to protect its</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>REDIRECT - GOOLSBY (Forman) 140</p> <p>1 trademarks; correct?</p> <p>2 A. Correct.</p> <p>3 Q. Does JDI consider its trademarks to be</p> <p>4 assets of the organization?</p> <p>5 A. Oh, most definitely, yes.</p> <p>6 Q. I want to be clear on this. Does JDI</p> <p>7 want to be in this particular lawsuit?</p> <p>8 A. No, no, not at all.</p> <p>9 MR. MCKERNAN: Those are all the</p> <p>10 questions that I have. Thank you for your time.</p> <p>11 THE WITNESS: Umm-hum.</p> <p>12 MS. FORMAN: I have a couple more in</p> <p>13 response.</p> <p>14 MR. MCKERNAN: Go ahead.</p> <p>15 REDIRECT EXAMINATION</p> <p>16 BY MS. FORMAN:</p> <p>17 Q. You were asked if this was the first</p> <p>18 lawsuit JDI has had to prosecute to protect its</p> <p>19 trademarks.</p> <p>20 A. In my 40-plus years. I am aware there</p> <p>21 was one back in the early '70s.</p> <p>22 Q. Are you aware of the, the case of --</p> <p>23 at the time it was International Order of Job's</p> <p>24 Daughters versus Lindeburg?</p> <p>25 A. Yes.</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>



*Job's Daughters International
Supreme Guardian Council*

*Kathleen E. Wiekhorst
Trademark Liaison, Board of Trustees*

*Heidi Yoast
Pink Power Printing
Maple Valley, Washington
425-295-4324*

December 30, 2015

It has come to our attention that articles are being offered for sale with the name "Job's Daughters" on the Go Jobies Facebook page, as well as other items using our trademarks.

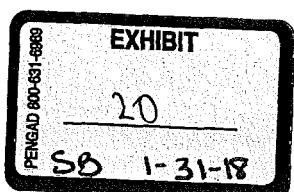
There is a strict procedure in place for using the Job's Daughters trademarks (including both registered and not registered trademarks). I am enclosing a copy of our trademark rules which are in alignment with the U.S. Government. Since this procedure was not followed on these articles you must cease and desist with the sale of these items immediately.

One of the main responsibilities of the Board of Trustees of Job's Daughters International is to protect our name and trademarks. At times, our diligence may not be welcome but it is vital we carefully monitor how and where our name and trademarks are being used.

Thank you for your prompt attention to this matter.

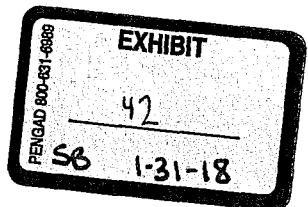
***Kathleen E. Wiekhorst, PHQ, PGG
Trademark Liaison, Board of Trustees***

Enclosure: SI-3 Trademark



HEIDI YOAST NOTES BY ROD REID

At the early March mid-year meeting in Tampa, Florida (March, 2015) I volunteered to meet with Heidi Yoast to discuss the Trademark issues. I did this because I am from her state and the Bethel that I associate with has used her in the past to print T-shirts. (No trademark images). I live about an hour's drive away. When I returned home from the meeting in Tampa I called her shop to set up a meeting. My idea was to discuss the issues with her and show her how to work within the system. When I called to make an appointment her husband answered and he quickly recognized my name and said "I know who you are and you are the one from this state who got elected to the Board." I asked if I could meet and talk with he and Heidi to discuss the Trademark issues. He quickly cut me off and told me that this issue would be handled by their attorneys. He then hung up!



1 The Honorable Robert S. Lasnik
2
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 JOB'S DAUGHTERS INTERNATIONAL,

11 Plaintiff,

12 v.

13 HEIDI YOAST,

14 Defendant.

15 HEIDI YOAST,

16 Counterclaim-Plaintiff,

17 v.

18 JOB'S DAUGHTERS INTERNATIONAL,
19 SHELLY COLE aka SHELLY HOWRIGON,
20 an individual, ROD REID, an individual,

21 Counterclaim-Defendants.

22 NO. 16-cv-1573-RSL

23 **HEIDI YOAST DEPOSITION
24 DESIGNATIONS IN SUPPORT OF
25 PLAINTIFF'S BRIEF IN OPPOSITION
26 TO DEFENDANT'S MOTION FOR
27 SUMMARY JUDGMENT**

28 24:5-19

29 37:23-38:1

30 38:4-7

31 41:8-42:16

32 43:15-44:1

33 59:7-63:1

34 Williams, Kastner & Gibbs PLLC
35 601 Union Street, Suite 4100
36 Seattle, Washington 98101-2380
37 (206) 628-6600

1 73:6-24
2 79:12-80:2
3 96:1-13
4 101:21-25
5 103:8-107:7
6 282:11-284:24
7 283:18-294:5
8 284:25-286:8
9 293:18-294:5
10 294:16-295:17
11 295:24-297:25
12 Exhibit 57
13 Exhibit 59
14 Exhibits 65-67

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26 PLAINTIFF'S BRIEF IN OPPOSITION TO DEFENDANT'S
27 MOTION FOR SUMMARY JUDGMENT
28 (16-cv-1573-RSL)

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Seattle, Washington 98101-2380
(206) 628-6600

DIRECT - YOAST (McKernan)	21	DIRECT - YOAST (McKernan)	22
1 those conversations.		1 have first spoken with roughly a year before you	
2 Q. Okay. But in terms of my question as		2 wrote your August 2016 letter in response to	
3 to when -- if I was trying to better identify the		3 statements you saw on social media from Shelly	
4 date you first got counsel, I would have to go to		4 Cole?	
5 those online posts from Shelly Cole, which you		5 A. No.	
6 believe I'm in possession of?		6 Q. Who was the first lawyer you would	
7 A. For clarification --		7 have spoken to? And again, let me be clear,	
8 MS. FORMAN: Object to the form --		8 Ms. Yoast. I just need a name. I don't need	
9 and just a reminder, give a little awkward pause,		9 substance of conversation, unless you want to tell	
10 like we talked about earlier. But just object as		10 me that, but I think your lawyer would probably	
11 to form and foundation.		11 object.	
12 Q. You can still answer, Ms. Yoast.		12 MS. FORMAN: Correct.	
13 A. For clarification, I would like to say		13 A. Tracey Munger.	
14 I did not retain counsel, but I may have discussed		14 Q. Okay. Is Mr. Nulud the first lawyer	
15 things with counsel.		15 that you engaged formally with respect to the JDI	
16 Q. Good. And you're now taking my job,		16 trademark dispute that brings us all here today?	
17 because you're now asking the next question I was		17 A. I believe that actually I had engaged	
18 going to ask. So there's a distinction in terms		18 Patricia and Philip Nulud at the same time.	
19 of when you first might have spoken with counsel,		19 Q. Okay. Got it. Do you recall when	
20 and then at some point you did retain counsel; is		20 that was?	
21 that correct?		21 A. To the best of my knowledge, it's	
22 A. That is correct.		22 probably the day I received the cease and desist	
23 Q. Let me ask you this. I know the first		23 letter from Debra (sic) Ma -- is that -- I don't	
24 lawyer that I'm aware of is a Philip Nulud from		24 know how to pronounce her last name. Mazour?	
25 Buchalter Nemer. Is he the gentleman you would		25 Q. Mazour.	
THIBAULT, SUHR & THIBAULT, INC.		THIBAULT, SUHR & THIBAULT, INC.	
Omaha, Nebraska (402) 331-2500		Omaha, Nebraska (402) 331-2500	
DIRECT - YOAST (McKernan)	23	DIRECT - YOAST (McKernan)	24
1 A. Mazour.		1 marked for identification.)	
2 Q. Okay. So the first time you formally		2 Q. Let me know, Ms. Yoast, once you have	
3 engaged a lawyer with respect to the trademark		3 that document in front of you.	
4 dispute was when you received the cease and desist		4 A. I have it.	
5 letter from Denise Mazour; correct?		5 Q. All right. You have in front of you	
6 A. Yes.		6 what's been marked here as Exhibit 57. Is that a	
7 Q. Okay. Ms. Yoast, when did you first		7 true and accurate copy of the cease and desist	
8 become aware that JDI was objecting to your use of		8 letter you received from Ms. Mazour?	
9 JDI trademarks?		9 A. To the best of my knowledge, yes.	
10 MS. FORMAN: Object, form, and calls		10 Q. And that document's dated August 17th,	
11 for a legal conclusion, and assumes facts not in		11 2016. Do you have any reason to believe you	
12 evidence.		12 didn't receive that shortly after August 17th,	
13 Q. You can answer.		13 2016?	
14 A. With the receipt of the cease and		14 A. Could you -- sorry. Brian, could you	
15 desist letter from Debra (sic) Mazour.		15 repeat your question again?	
16 Q. Okay. So I want to be clear on this.		16 Q. Absolutely. Do you have any reason to	
17 The first time you became aware that JDI had an		17 believe that you did not receive Exhibit 57	
18 issue with you with respect to the JDI trademarks		18 shortly after August 17th, 2016?	
19 was when you received the cease and desist letter		19 A. No.	
20 from Ms. Mazour?		20 Q. Okay. And the receipt of that letter	
21 A. Yes.		21 is what you -- that was going to be a bad	
22 MR. MCKERNAN: Okay. Dan, could you		22 question. Sorry.	
23 pull out folder 30 and provide a copy of that to		23 The receipt of Exhibit 57 is what led you	
24 the witness?		24 to formally engage Ms. Forman and Mr. Nulud?	
25 (Deposition Exhibit Number 57 was		25 A. Yes.	
THIBAULT, SUHR & THIBAULT, INC.		THIBAULT, SUHR & THIBAULT, INC.	
Omaha, Nebraska (402) 331-2500		Omaha, Nebraska (402) 331-2500	

DIRECT - YOAST (McKernan)	37	DIRECT - YOAST (McKernan)	38
1 maybe improperly assuming that you did, but let's 2 assume for the purposes of this question that you 3 did remove images that contained the phrase "Job's 4 Daughters." Why would you have removed those images?		1 A. I have had -- oh, yes. 2 Q. Okay. 3 A. Job's Daughters, right, yes. 4 Q. Since 2014, have you utilized Iyob 5 Filiae on any soft good items that you've 6 produced?	
6 A. I would not have specifically removed 7 an image because of words on it. I may have 8 removed an image to put something new up, or I may 9 have wanted to change something around. There's a 10 lot of different possibilities why I might have 11 updated or put new photos or whatnot.		7 A. Yes. 8 MR. MCKERNAN: Okay. And for the 9 court reporter, when I use the term "Iyob Filiae," 10 it's I-Y-O-B F-I-L-I-A-E.	
12 Q. Okay. Have you ever removed any 13 images as a result of the cease and desist letter 14 you received as set forth in Exhibit 5 or the 15 lawsuit that has been filed against you?		11 Q. When did you first start making soft 12 goods utilizing either of those phrases? 13 A. I believe, to the best of my 14 knowledge, in 2009 my daughter's bethel guardian 15 came to me and asked me to help them make some 16 bethel shirts.	
16 A. No. 17 Q. Okay. If any images have been 18 removed, that would have just been in the natural 19 course of your business in terms of updating those 20 sites?		17 Q. Okay. And is that, to the best of 18 your recollection, the first time you would have 19 started using the "Job's Daughters" or the "Iyob 20 Filiae" phrases on soft goods?	
21 A. Well, I guess in natural course of 22 social media or whatnot, yes. 23 Q. Okay. Since 2014, have you utilized 24 the term "Job's Daughters" on various soft good 25 items that you've produced?		21 A. Yes. 22 Q. If I wanted to get my arms around 23 every instance when you've utilized those phrases, 24 would I be able to do that through the invoices 25 that you generate through your business?	
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DIRECT - YOAST (McKernan)	39	DIRECT - YOAST (McKernan)	40
1 A. Can you repeat that question? 2 Q. Absolutely. If I was trying to get my 3 arms around each and every time you utilized 4 either the "Job's Daughters" or the "Iyob Filiae" 5 phrases on soft goods, could I get that 6 information if I was to review the invoices you've 7 generated?		1 1. it in a file. 2 Q. What would you write down and put in a 3 file? 4 A. I may, not always mind you, especially 5 if I've made it for myself. I might not even have 6 kept track if it's for myself. If I made a shirt 7 for me, more than likely I probably didn't keep 8 track.	
8 A. No. 9 Q. Would you agree with me that you've 10 utilized those phrases on soft goods without 11 invoicing for them? 12 A. As gifts or a sample. 13 Q. Okay. How do you keep track of those 14 gifts or samples from your business standpoint? 15 A. Fairly poorly, my bookkeeper might 16 say, because she gets to go through little pieces 17 of paper. Good question. Like I said, that's a 18 good question. How do I -- I'm sorry. Can you 19 repeat that again?		9 Q. Okay. 10 A. If I did, I take pictures. Like -- I 11 love taking pictures. Other than that, there -- 12 you know, I may have written down I used one 13 T-shirt or something along those lines.	
20 Q. How do you keep track of the gifts and 21 the samples that you create that would have 22 contained the phrases "Job's Daughters" or "Iyob 23 Filiae"?		14 Q. Okay. 15 A. Very poorly. 16 Q. You indicated in 2009 you may have 17 created certain T-shirts for your daughter who was 18 in Job's Daughters; correct? 19 A. No. Let me clarify.	
24 A. Okay, gotcha. Usually with a 25 photograph, or I'll write down something and put		20 MS. FORMAN: Object as to form and 21 misstates previous testimony. 22 A. The bethel guardian. 23 MR. MCKERNAN: I probably agree with 24 your objections. 25 Q. Will you help me out there, Ms. Yoast?	
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<p>DIRECT - YOAST (McKernan) 41</p> <p>1 A. The bethel guardian -- the bethel 2 guardian asked me to help them make some spirit 3 wear with, like -- you know, like T-shirts for 4 their bethel.</p> <p>5 Q. Got it.</p> <p>6 A. I was just learning how to screen 7 print.</p> <p>8 Q. Okay. Because you first started your 9 screen printing business in 2009; correct?</p> <p>10 A. To the best of my knowledge, right 11 around -- I was learning. I started out as, as a 12 hobby when I got sick.</p> <p>13 Q. Okay. How do I determine how much 14 soft goods you've created -- let me back up.</p> <p>15 Do you understand when I use the term 16 "soft goods" what I mean?</p> <p>17 A. Yes, I do.</p> <p>18 Q. Would you agree with me that soft 19 goods includes T-shirts, sweatpants, sweatshirts, 20 clothing items, backpacks? Is that an accurate 21 description of how you would define soft goods?</p> <p>22 A. You're definitely on the right track.</p> <p>23 Q. Are there any other soft goods that 24 you've created that I did not just mention?</p> <p>25 A. How about dog beds?</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - YOAST (McKernan) 42</p> <p>1 Q. Okay. Anything else?</p> <p>2 A. That would take me probably a lot 3 of -- I'd have to go back. Right now at this 4 time, I'm probably going to have a hard time 5 coming up with lots of soft goods for you, but 6 you've given a general -- I understand what you're 7 talking about when you say soft goods.</p> <p>8 Q. Okay. So if I use the term "soft 9 goods," you and I will have a general 10 understanding on what that term means; correct?</p> <p>11 A. Brian, you cut out. I'm sorry. I 12 couldn't hear you.</p> <p>13 Q. That's okay. So if I use the term 14 "soft goods," you and I will have a general 15 understanding of what that term means; correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Since receiving the cease and 18 desist letter or the lawsuit, have you changed any 19 of your practices with respect to your use of the 20 terms "Job's Daughters" or "Iyob Filiae"?</p> <p>21 MS. FORMAN: Objection as to form 22 and vague as to the cease and desist letter. You 23 can answer if you understand.</p> <p>24 Q. Let me clarify that with Exhibit 57 25 that we've talked about.</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>
<p>DIRECT - YOAST (McKernan) 43</p> <p>1 A. Could you ask the -- can you ask the 2 question again, then?</p> <p>3 Q. Actually, it brings up a good 4 question. Have you ever received any other cease 5 and desist letters from JDI or on behalf of JDI 6 other than Exhibit 57?</p> <p>7 A. Absolutely not.</p> <p>8 Q. Okay. So if I was to ask you if you 9 changed your practices with respect to your use of 10 the "Job's Daughters" or "Iyob Filiae" phrases 11 since receiving this cease and desist letter or 12 the lawsuit, would you understand what I mean?</p> <p>13 A. Yes, but could you be more specific, 14 please?</p> <p>15 Q. Sure. Do you still utilize Job's 16 Daughters and Iyob Filiae after receiving 17 Exhibit 57 and/or the lawsuit in this -- that's 18 been filed against you?</p> <p>19 A. Oh, oh. To the -- okay. To the best 20 of my recollection -- do I -- I'm sorry. I just 21 totally spaced out again.</p> <p>22 Are you asking if I have utilized the 23 words "Job's Daughters" after I received the cease 24 and desist?</p> <p>25 Q. Or Iyob Filiae, either of those.</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - YOAST (McKernan) 44</p> <p>1 A. Yes.</p> <p>2 Q. Okay. How do I determine when you 3 would have created soft goods bearing the "Job's 4 Daughters" or the "Iyob Filiae" phrases after 5 receiving Exhibit 57?</p> <p>6 A. Good question. I believe it was one 7 bethel in Idaho, and there was a big, long 8 disclaimer that the bethel guardian had to sign in 9 order for me to even consider doing them. It was 10 a prior conversation she had with me before about 11 doing them.</p> <p>12 Q. Okay.</p> <p>13 A. But after that, I'm pretty annoyed, so 14 I don't particularly like to do that any -- I mean 15 that's -- I just don't want to do it.</p> <p>16 Q. Okay. So let's break that down a 17 little bit if you're okay.</p> <p>18 A. Sure.</p> <p>19 Q. After receiving Exhibit 57, it's your 20 testimony you've utilized the phrase "Job's 21 Daughters" or "Iyob Filiae" on one order that you 22 filled for a bethel in Idaho; is that correct?</p> <p>23 A. To the best of my knowledge, but I 24 couldn't be accurate with you at the moment as to 25 how many that might be. I can tell you that I</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>

<p>DIRECT - YOAST (McKernan) 57</p> <p>1 phrases after August 17th, 2016?</p> <p>2 A. I would have to go back and do like</p> <p>3 we said. I would have to go back and review and</p> <p>4 look at the last year.</p> <p>5 Q. Okay. But based on the information I</p> <p>6 have, that's not something I could do?</p> <p>7 A. I guess you -- I mean of course you</p> <p>8 could if you wanted to get ahold of all the states</p> <p>9 that have Job's Daughters. Sadly, it's not that</p> <p>10 many anymore.</p> <p>11 Q. Okay.</p> <p>12 A. So it probably wouldn't take that</p> <p>13 long.</p> <p>14 Q. But who --</p> <p>15 A. You could. Yes, you could.</p> <p>16 Q. I apologize, because I was violating</p> <p>17 my rule of the awkward pause.</p> <p>18 But when you say I could contact Job's</p> <p>19 Daughters, whom would I contact? What's my</p> <p>20 universe of people that I'm going to reach out to</p> <p>21 and introduce myself to? Not that I'm going to do</p> <p>22 that, but --</p> <p>23 A. Great question. You'd meet a lot of</p> <p>24 really nice people, I'm sure. What you would</p> <p>25 probably do is you would probably get ahold of</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - YOAST (McKernan) 58</p> <p>1 either a bethel guardian, or there's lists</p> <p>2 available, I think, on the JDI web site, I'm</p> <p>3 pretty sure.</p> <p>4 Q. Yeah, but I --</p> <p>5 A. You could contact states.</p> <p>6 Q. I'm not going to physically contact</p> <p>7 the 600 bethels or whatever. Is there any -- is</p> <p>8 there a universe you can provide me that's smaller</p> <p>9 in terms of -- what I'm trying to get at is we</p> <p>10 recall the Idaho order. Other than contacting the</p> <p>11 600-and-so bethels or grand guardian council or</p> <p>12 supreme council, is there some way I can get my</p> <p>13 arms around what that may be other than contacting</p> <p>14 all those people?</p> <p>15 A. Right, I understand what you're</p> <p>16 saying. And my response to contacting all these</p> <p>17 other people was merely that is obviously a</p> <p>18 possibility, and it is an avenue you could do if</p> <p>19 you had a lot of time. But for the sake of, you</p> <p>20 know, helping each other out -- and I know what,</p> <p>21 what you're trying -- the information you're</p> <p>22 needing to see. It would be a matter of me going</p> <p>23 back and looking at, you know, what I've done and</p> <p>24 looking at pictures. So that would take a review</p> <p>25 on my part if we wanted to go, you know, a faster</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>
<p>DIRECT - YOAST (McKernan) 59</p> <p>1 route than you making some new friends.</p> <p>2 Q. Okay. But without those pictures or,</p> <p>3 or something, I would need your assistance?</p> <p>4 A. I mean ultimately, no, you wouldn't,</p> <p>5 but you -- but it would be helpful to you if I did</p> <p>6 it.</p> <p>7 Q. Okay. Have you ever sought permission</p> <p>8 from JDI to utilize the Job's Daughters, the Iyob</p> <p>9 Filiae, or the -- or JDI or any of the JDI</p> <p>10 trademarks on any soft goods?</p> <p>11 A. Have I personally?</p> <p>12 Q. Correct.</p> <p>13 A. Not as a vendor. Are you talking</p> <p>14 about me personally as a -- one person?</p> <p>15 Q. Correct.</p> <p>16 A. No.</p> <p>17 Q. Okay. Has --</p> <p>18 A. To the best of my knowledge, no.</p> <p>19 Q. Okay. Has anyone on your behalf ever</p> <p>20 contacted JDI to seek permission to utilize the</p> <p>21 JDI marks on any soft goods?</p> <p>22 A. Okay. That's an interesting question</p> <p>23 that you ask. Can you get a little more specific?</p> <p>24 When you ask me has anybody on my behalf, are you</p> <p>25 talking about me as a vendor as somebody who makes</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - YOAST (McKernan) 60</p> <p>1 things, or as a Job's Daughter person, or a mom?</p> <p>2 I guess I -- if you can clarify that, it would be</p> <p>3 really helpful.</p> <p>4 Q. I'm asking you, and you can put</p> <p>5 whatever hat on you want --</p> <p>6 A. Okay.</p> <p>7 Q. -- but you or anyone on your behalf</p> <p>8 seeking permission from JDI to use the JDI marks.</p> <p>9 A. I believe, to the best of my</p> <p>10 recollection, that you will find -- there are</p> <p>11 grand guardian councils, there are bethel</p> <p>12 guardians, there's supreme bethel people that have</p> <p>13 taken appropriate measures with their -- you know,</p> <p>14 with permissions or whatever when they have</p> <p>15 contacted me to make items. Does that answer your</p> <p>16 question?</p> <p>17 Q. No, but that's okay. Have you ever</p> <p>18 sought permission from JDI to utilize the JDI</p> <p>19 marks?</p> <p>20 A. To the best of my recollection while</p> <p>21 we're talking right, right at this moment, no.</p> <p>22 Q. Okay. So would it be a true statement</p> <p>23 then -- well, strike that. That was going to be a</p> <p>24 bad question.</p> <p>25 A. Can you clarify as to what, what would</p> <p>THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>

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1 be the reason that I would do that? That might		1 of Job's Daughters; correct?	
2 help me.		2 A. Sure, I'm a majority member. That's	
3 Q. Well --		3 right.	
4 A. What would be the reason I would		4 Q. Right. And at age 20, you become a	
5 actually do that?		5 majority member of Job's Daughters?	
6 Q. Okay. One reason might be because		6 A. That's right.	
7 there's a legal obligation. And I don't want to		7 Q. Okay. As a member of Job's Daughters,	
8 get into that discussion with you, because you and		8 you would agree with me that you take an oath and	
9 I are probably going to disagree on that.		9 an obligation to uphold the constitution and the	
10 A. Sure.		10 bylaws of Job's Daughters; correct?	
11 Q. But let's, let's back up.		11 A. Oh, I, I -- yes, I agree. I'm sure I	
12 A. Maybe an example of how I might do		12 did.	
13 that or why I might.		13 Q. And are you aware of bylaws that	
14 Q. Okay. You were a member of Job's		14 relate to the use of the JDI trademarks?	
15 Daughters for a period of time; correct?		15 A. I relate to what are the registered	
16 A. Yes.		16 trademarks of JDI, absolutely. I know what the	
17 Q. Okay. When were you a member of Job's		17 registered trademarks are.	
18 Daughters?		18 Q. Okay. But that's not my question. My	
19 A. Oh, my God. Back in Methuselah's age.		19 question is, are you familiar with the bylaws of	
20 No. I was initiated in '81.		20 Job's Daughters that relate to trademarks?	
21 Q. Okay. And how long were you a member		21 A. Yeah, I would say I'm fairly familiar.	
22 of Job's Daughters? From 1981 to?		22 I, I don't think I know them word for word, but	
23 A. Well, I'm still a member.		23 yes.	
24 Q. Okay. And at age 20, though -- and		24 Q. You know where you can find them;	
25 you bring up a good point. You're still a member		25 correct?	
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DIRECT - YOAST (McKernan)	63	DIRECT - YOAST (McKernan)	64
1 A. Oh, sure, sure.		1 because these don't correspond to those folders?	
2 Q. Yeah. And you could find them online;		2 THE WITNESS: 58.	
3 correct?		3 MR. MCKERNAN: Yeah, folder 40.	
4 A. Oh, are you asking if I could find		4 THE WITNESS: It's your number 58.	
5 them online?		5 MR. MCKERNAN: No.	
6 Q. Correct.		6 MS. FORMAN: I only have up to 48.	
7 A. Bylaws online, is that what you're		7 THE WITNESS: Oh, I'm sorry. I was	
8 saying?		8 talking about our -- in discovery, number 58.	
9 Q. Correct.		9 MR. MCKERNAN: Patricia, it's	
10 A. I -- you know, that's a good question.		10 folder 40.	
11 I'm not sure.		11 MS. FORMAN: Okay.	
12 Q. Okay. Are you familiar with SI-3?		12 Q. Let me know once you've had a chance	
13 A. You'd have to actually show it to me.		13 to review it.	
14 It's been years since I've been on a bethel		14 A. Oh, I've seen this. Yes, I've seen	
15 council, a lot of years.		15 this.	
16 MR. MCKERNAN: Okay. Dan, will you		16 Q. When is the first time you saw	
17 hand her folder 40?		17 Exhibit 58?	
18 THE WITNESS: Thank you very much.		18 A. When you sent it in your discovery.	
19 (Deposition Exhibit Number 58 was		19 Q. Okay. You never saw it prior to	
20 marked for identification.)		20 receiving it in the discovery that was sent to	
21 Q. Ms. Yoast, I'm handing you what's been		21 you?	
22 marked as Exhibit 58. Could you please review		22 A. No.	
23 that?		23 Q. Okay. If you look at the second page	
24 MS. FORMAN: And can you tell me		24 of Exhibit 58, I will represent to you that that	
25 which number this is that you sent me, Brian,		25 was the SI-3 I was referring to previously. Have	
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1 preparation for today's --		1 very hard not to. I'm trying really hard to stay	
2 A. Oh, for today? No, I did not have		2 healthy and not sick, because it's very stressful.	
3 time.		3 Q. Okay. So do you recall specifically	
4 Q. Okay. So you didn't look at those		4 any documents that you reviewed to prepare for	
5 prior to meeting here today?		5 today's deposition, whether it was on your own	
6 A. No. I, I -- I mean Patricia e-mailed		6 time or whenever you would have done so?	
7 me, and I -- honestly, I did not have time to go		7 A. You know, that's actually a very, very	
8 over them. I've got a little kid in, like, select		8 good question. The document that you just gave	
9 baseball, and it's crazy.		9 me, right, in reviewing that, I have reviewed that	
10 Q. Okay.		10 because I find it really curious. I find it -- it	
11 A. So I don't -- I don't have a lot of		11 really looks like it's part of two documents.	
12 time.		12 Q. Okay. What do you mean by that?	
13 Q. So in terms of the documents you		13 A. I recognize -- I recognize the font on	
14 reviewed, the discovery, what type of documents do		14 the top addressed to me. I recognize that from	
15 you recall reviewing to prepare for your		15 another letter that was sent to me from Kathy, a	
16 deposition today?		16 previous gal, and I -- it just -- it looked very	
17 A. Well, in all honesty, Brian, I		17 curious to me. So, yes, I probably spent more	
18 wouldn't say that I was, like, reviewing things		18 time looking at this one because it looked a	
19 for the deposition. I mean I continuously -- I'm		19 little bit like it's been cut and pasted together.	
20 so baffled by the whole thing and feel it's just		20 Q. Looks like a previous cease and desist	
21 quite often, you know. Every once in a while I'll		21 letter that you may have seen?	
22 pop one up and go, what was that or what -- you		22 A. Oh, no. Oh, no, no, no, no. Kathy,	
23 know, whatnot. But you've got to remember, this		23 the previous gal, wrote me a really lovely letter.	
24 is, like, a tiny part of my life, you know. I try		24 You have it. It's all to do with selling at	
25		25 supreme. It's when I was asked to make a proposal	
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1 -- I was asked by Patty Reardon to propose to do		1 A. To the best of my recollection, the	
2 this for them, and she sent me a very nice letter,		2 date's proper.	
3 and the header is exactly the same as that letter.		3 Q. And that was submitted after you	
4 Q. All right. And is that a letter you		4 made -- or Patty Reardon actually made a proposal	
5 recall receiving?		5 for you to supply merchandise to supreme?	
6 A. Yes.		6 A. Be a vendor at supreme session.	
7 Q. Okay. Let's -- give me one second.		7 Q. Right. If you look at --	
8 MR. MCKERNAN: Will you, Dan, hand		8 A. So to be -- no, no, no, no. It's to	
9 her file 31?		9 be a vendor at supreme. I was asked to make a	
10 (Exhibit Number 59 was marked for		10 proposal to the board to be a vendor at supreme.	
11 identification.)		11 Q. By Patty Reardon?	
12 Q. I'm handing you what's been marked as		12 A. Yes.	
13 Exhibit 59. Do you have that in front of you?		13 Q. Okay. And in this letter, Kathy	
14 A. I have 60 and 61.		14 Wiekhorst sent you a copy of the constitution that	
15 Q. Yeah, it's Bates stamped JDI000060 to		15 deals with JDI's trademarks; correct?	
16 61.		16 A. I, I see it on this, but I don't	
17 A. Yeah.		17 believe that I got that from her correspondence.	
18 Q. Okay.		18 I don't think it was in it.	
19 A. Yep.		19 Q. Okay. If you look at the second	
20 Q. Is that the letter -- the nice letter		20 paragraph -- let me know if I read this	
21 you recall receiving from Kathy after you		21 correctly -- it says, I'm enclosing the portion of	
22 submitted a --		22 our constitution that deals with the trademark and	
23 A. Yes.		23 its use. Did I read that correctly?	
24 Q. Okay. And do you recall receiving		24 A. Yes, you did.	
25 that letter on or about April 1st, 2014?		25 Q. And is it your testimony that you did	
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<p>DIRECT - YOAST (McKernan) 93</p> <p>1 "Iyob Filiae" without permission?</p> <p>2 MS. FORMAN: Same objection. But</p> <p>3 you can answer.</p> <p>4 A. My ability is where I'm, I'm confused.</p> <p>5 No, no, not about my ability, no.</p> <p>6 Q. Okay. Do you recall any specific</p> <p>7 conversation you had with Kathy Wiekhorst about</p> <p>8 your ability to use JDI on any soft goods without</p> <p>9 permission?</p> <p>10 A. No.</p> <p>11 MS. FORMAN: Asked and answered.</p> <p>12 But go ahead and answer.</p> <p>13 A. No.</p> <p>14 Q. If you look back at -- did you ever</p> <p>15 have any discussions with Kathy Wiekhorst about</p> <p>16 the need to pay a royalty of 20 percent if you</p> <p>17 used the phrase "Job's Daughters," "Iyob Filiae,"</p> <p>18 or "JDI"?</p> <p>19 A. Yeah, can you rephrase that?</p> <p>20 Q. Do you recall having any discussions</p> <p>21 with Kathy Wiekhorst about your need to pay a</p> <p>22 royalty if you use "Job's Daughters," "Iyob</p> <p>23 Filiae," or "JDI" on any soft goods?</p> <p>24 A. Just for clarification, do you believe</p> <p>25 her letter is communication, or are we talking</p> <p>THIBAULT, SUHR & THIBAULT, INC.</p> <p>Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - YOAST (McKernan) 94</p> <p>1 about talks?</p> <p>2 Q. Talks.</p> <p>3 A. No, huh-uh.</p> <p>4 Q. Okay. And you bring up a good point,</p> <p>5 and I saw you're referring -- I think you're</p> <p>6 looking at Exhibit 59?</p> <p>7 A. Yes.</p> <p>8 Q. Okay.</p> <p>9 A. Yes.</p> <p>10 Q. And I want to look at the last</p> <p>11 sentence of the second paragraph. It says, any</p> <p>12 time you do use the logos, words/letters...Job's</p> <p>13 Daughters, JD, a royalty of 20 percent must be</p> <p>14 sent to the supreme office. Did I read that</p> <p>15 correctly?</p> <p>16 A. Yes.</p> <p>17 Q. Did you ever send a royalty of</p> <p>18 20 percent to the supreme office when you used</p> <p>19 Job's Daughters on any soft goods?</p> <p>20 MS. FORMAN: Objection, it's vague</p> <p>21 as to when you used. But you can answer if you</p> <p>22 understand the question.</p> <p>23 A. Well, no, I'm confused by that now</p> <p>24 because -- and I guess clarification would help.</p> <p>25 When would that be -- when would I -- what would</p> <p>THIBAULT, SUHR & THIBAULT, INC.</p> <p>Omaha, Nebraska (402) 331-2500</p>
<p>DIRECT - YOAST (McKernan) 95</p> <p>1 I have -- I'm confused. When would I have sent</p> <p>2 them money? For what? Is that not something the</p> <p>3 bethel sends to them?</p> <p>4 Q. Okay.</p> <p>5 A. Because they're particularly -- I'm</p> <p>6 not the one using it. I'm the vendor. I'm</p> <p>7 printing. And actually, to be clear, I haven't</p> <p>8 used -- well, I see what you're -- okay. Sorry.</p> <p>9 Let me slow down for your gal. I keep forgetting</p> <p>10 she's there. I'm sorry. It would be nice if I</p> <p>11 saw her, because I can't.</p> <p>12 Right, that would be the bethel's use,</p> <p>13 not the vendor's use.</p> <p>14 Q. So you think the reference in</p> <p>15 Exhibit 59 was telling you that a bethel needs to</p> <p>16 pay a royalty, not you?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Did you ever have any</p> <p>19 discussions with Kathy Wiekhorst about that?</p> <p>20 A. No.</p> <p>21 Q. Did you ever tell any bethels that</p> <p>22 would have ordered items from you that utilizes</p> <p>23 Job's Daughters that they needed to pay a royalty</p> <p>24 of 20 percent?</p> <p>25 A. No.</p> <p>THIBAULT, SUHR & THIBAULT, INC.</p> <p>Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - YOAST (McKernan) 96</p> <p>1 Q. Did you ever tell any bethels or any</p> <p>2 Job's Daughters members that they did not need to</p> <p>3 seek approval from JDI to use the phrase "Job's</p> <p>4 Daughters," "Iyob Filiae," or any other</p> <p>5 unregistered trademarks?</p> <p>6 A. Yes.</p> <p>7 Q. And whom did you tell that to?</p> <p>8 A. Probably the Halls, Brianna Hall and</p> <p>9 her mother --</p> <p>10 Q. Okay.</p> <p>11 A. -- Barbara Hall.</p> <p>12 Q. And why did you tell them that?</p> <p>13 A. Because that's what I was told.</p> <p>14 Q. And who were you told that by?</p> <p>15 A. To my recollection, like I said, that</p> <p>16 specific -- if you're looking at a specific</p> <p>17 instance, I'd have to go back and look. But more</p> <p>18 than likely from the conversation that I've had</p> <p>19 with Kathy and -- like I said, I'd have to go back</p> <p>20 and look. I'm sure I have -- you know, something</p> <p>21 else can spark my memory on that.</p> <p>22 Q. What else would spark your memory on</p> <p>23 that?</p> <p>24 A. I don't believe the words "Job's</p> <p>25 Daughters" are a trademark. I mean these are --</p> <p>THIBAULT, SUHR & THIBAULT, INC.</p> <p>Omaha, Nebraska (402) 331-2500</p>

DIRECT - YOAST (McKernan)	101	DIRECT - YOAST (McKernan)	102
1 was huge in this organization. And I apologize		1 Q. Okay. Have I exhausted your memory as	
2 for not being able to give you specific things		2 you sit here today, Ms. Yoast, of the discussion	
3 that I know that you need to be helpful. This is		3 you had with Kathy Wiekhorst after receiving	
4 the worst thing could ever happen to somebody like		4 Exhibit 59 with respect to your ability to utilize	
5 me. And I'm really sorry. The specifics are		5 the phrase "Job's Daughters," "Iyob Filiae," or	
6 very, very, very difficult. And I just -- I want		6 "JDI"?	
7 to help you, and I want to be able to give you		7 A. Yeah, yes.	
8 these specifics, but these dates and these		8 MR. MCKERNAN: Thank you. Why don't	
9 conversations, these are -- these are a time in my		9 we take just a two-minute break, if you're okay	
10 life that was probably the most difficult. And		10 with that.	
11 I'm sure you can understand, but it's very hard.		11 THE WITNESS: Uh-huh.	
12 I love this organization, and I'm sad where it's		12 MR. MCKERNAN: And then -- actually,	
13 at.		13 hold on one second. So it's, it's 2:00 my time.	
14 Q. On behalf of the organization, they're		14 It's noon your time. My suggestion is I would	
15 sad where this is at, too. Okay? Having said		15 like to keep plowing through, but I want you to	
16 that, unfortunately this is the process we have to		16 have a chance to get something to eat. We can go	
17 go through. If you don't have a recollection, I		17 off the record for this.	
18 understand that, and that's all I need to know.		18 (An off-the-record discussion was	
19 Okay?		19 held, and a short recess was taken from 2:01 p.m.	
20 A. Umm-hum.		20 until 2:18 p.m.)	
21 Q. Would you agree with me that		21 BY MR. MCKERNAN:	
22 Exhibit 59 informed you that JDI had a		22 Q. Let's go back on the record.	
23 constitution provision that dealt with the use of		23 Ms. Yoast, do you understand you're still under	
24 trademarks?		24 oath?	
25 A. Yes.		25 A. I do.	
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DIRECT - YOAST (McKernan)	103	DIRECT - YOAST (McKernan)	104
1 Q. Okay. Do you have any formal training		1 Facebook is the Got Jobies Facebook page.	
2 with respect to trademarks or trademark law?		2 A. I don't -- that's a name that I don't	
3 A. No.		3 use anymore. I've merged a bunch of pages	
4 Q. Okay. You don't hold yourself out to		4 together.	
5 be an expert in the area of trademarks or		5 Q. Okay. When did you merge those pages	
6 trademark law?		6 together?	
7 A. No.		7 A. Oh, well, I tried -- I mean I started	
8 Q. Okay. The name of your business is		8 trying to figure out how to do it quite awhile --	
9 Pink Power Printing; is that correct?		9 couple -- quite a few years ago because it was	
10 A. Yes.		10 difficult. I'd have to go back and actually look.	
11 Q. Okay. And that's just a DBA. In		11 I'm sure there's a record of when I was doing	
12 other words, there's not a formal corporation or		12 that.	
13 LLC set up by that name, is there?		13 Q. Okay.	
14 A. No. I'm a sole proprietorship.		14 A. I merged all the youth group kind of	
15 Q. Okay. You own a web site called		15 thingies together.	
16 Pinkpowerprinting.com; is that correct?		16 Q. Okay. You know -- let me ask you	
17 A. Yes.		17 this. Were you using the Got Jobies Facebook page	
18 Q. Okay. And you also utilize certain		18 from 2009 through -- until you merged these	
19 Facebook pages to advertise and promote your		19 together?	
20 business, as well; correct?		20 A. I don't recall if those dates are	
21 A. I wouldn't say -- I mean promoting --		21 right, but I have -- yeah, but I -- yes, that was	
22 well, in loose terms, yes.		22 definitely my page.	
23 Q. Okay.		23 Q. Okay. What's your best understanding	
24 A. Sure.		24 of how long you utilized -- and I realize you'd	
25 Q. And the pages I'm referring to on		25 want to go back and double check, I'm not trying	
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<p>DIRECT - YOAST (McKernan) 105</p> <p>1 to hold your feet to the fire -- but how long you 2 used the Got Jobies Facebook page to advertise 3 your business or your work?</p> <p>4 A. Okay. Got Jobies; right?</p> <p>5 Q. Yeah. I'm from a small town in 6 Nebraska, so when I mispronounce stuff like that, 7 I apologize.</p> <p>8 A. That's okay. No, no, no. It's 9 actually quite cute, but it just makes me laugh a 10 little bit. It's kind of funny.</p> <p>11 Q. Good.</p> <p>12 A. So -- yeah. So the Got Jobies, yeah, 13 probably -- it might have been more like 2010. 14 I'm trying to think. It was quite awhile ago. 15 And it really was -- it started off just for fun. 16 It really didn't start off as, like, thinking it 17 would be, like, a business page. It was more of a 18 post your Jobie fun stuff. I had lots of other 19 people, like Leslee had her dolls on there, and it 20 was really kind a fun, really social thing to 21 begin with.</p> <p>22 Q. But to your best recollection, you 23 started utilizing it roughly in 2010. Would you 24 agree with me that you continued to utilize it 25 through receiving the cease and desist letter on</p> <p style="text-align: center;">THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - YOAST (McKernan) 106</p> <p>1 August 17th, 2016?</p> <p>2 A. I believe that by that time, though, 3 it was Sweet JoRaDe.</p> <p>4 Q. Okay. You just -- again, you're -- 5 this is foreshadowment. You're kind of leading me 6 now. The other Facebook page that you utilized 7 was Sweet JoRaDe, and that's J-O-R-A-D-E?</p> <p>8 A. Right. That's a -- that's a 9 consolidation of other pages.</p> <p>10 Q. I got it. So when you consolidated 11 these other pages, those -- that consolidation 12 became known as Sweet JoRaDe?</p> <p>13 A. Exactly.</p> <p>14 Q. What other pages other than the Got 15 Jobies -- did I get that right?</p> <p>16 MS. MUNGER: No. Got Jobies.</p> <p>17 A. No, Jobies. Try Jobies. Think of 18 Jobs. Think of Jobs.</p> <p>19 Q. I know. Got Jobies --</p> <p>20 A. There you go.</p> <p>21 Q. -- were consolidated into the Sweet 22 JoRaDe page?</p> <p>23 A. I'm sorry. Say it again. I was 24 laughing. I'm sorry.</p> <p>25 Q. What other pages on Facebook got THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>
<p>DIRECT - YOAST (McKernan) 107</p> <p>1 consolidated into the Sweet JoRaDe other than Got 2 Jobies?</p> <p>3 A. How it was, it was Got Rainbow and the 4 Got Jobies, and I created Sweet JoRaDe, and we 5 merged the other two into Sweet JoRaDe, if that 6 makes sense.</p> <p>7 Q. Got it.</p> <p>8 A. And Sweet JoRaDe is -- I have a DBA 9 Sweet JoRaDe.</p> <p>10 Q. Okay. So if I wanted to find your 11 business today, I would either go to your Pink 12 Power Printing web site or the Sweet JoRaDe 13 Facebook page?</p> <p>14 A. You probably wouldn't go to my Pink 15 Power Printing web site because I'm lame and I 16 have a really hard time keeping up on it, but I do 17 have a Facebook page for Pink Power Printing.</p> <p>18 Q. Okay. To the extent there's still 19 Pink Power -- wait. You say you have a Facebook 20 page for Pink Power Printing?</p> <p>21 A. Yes.</p> <p>22 Q. That's separate and distinct from the 23 Sweet JoRaDe Facebook page?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And am I correct, though, you</p> <p style="text-align: center;">THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>	<p>DIRECT - YOAST (McKernan) 108</p> <p>1 still have the Pinkpowerprinting.com domain name, 2 it just may not have been updated?</p> <p>3 A. Yes, right, yes.</p> <p>4 Q. Okay. Are you an administrator or a 5 moderator on any other Facebook pages that involve 6 Job's Daughters?</p> <p>7 A. Yes.</p> <p>8 Q. Do you want to tell me about them?</p> <p>9 A. Yeah, I was waiting for you to ask.</p> <p>10 Sorry. I was trying to be helpful.</p> <p>11 Q. I know.</p> <p>12 A. I am -- I think I'm a moderator. I 13 think I'm only a moderator on -- what's it called 14 -- Job's Daughters Uncensored -- or Uncensored 15 Discussion -- shoot. I don't even remember what 16 the name is.</p> <p>17 Q. Jobie Discussion Forum Uncensored?</p> <p>18 A. Is that -- yes, I think -- yes.</p> <p>19 Q. Okay. Are you a moderator?</p> <p>20 A. Yeah, I'm pretty sure I'm a moderator.</p> <p>21 Q. Okay. Any other?</p> <p>22 A. Any -- no.</p> <p>23 Q. Okay. How about Occupy Job's 24 Daughters?</p> <p>25 A. What's the question?</p> <p style="text-align: center;">THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500</p>

DIRECT - YOAST (McKernan)	285	DIRECT - YOAST (McKernan)	286
1 soft goods on your Facebook page or on your Pink		1 site or your Facebook, that's something where you	
2 Power Printing web site?		2 would have taken pictures and put these pictures	
3 A. Oh, yes, because that's how they got		3 on those, those platforms?	
4 the screen shot. These are screen shots, yeah.		4 A. Yes.	
5 Q. Right. And you did that with all of		5 Q. Okay. Did you receive any permission	
6 these images, correct, with the exception of		6 from JDI to post any of these pictures on your	
7 page 11? Which correct me if I'm wrong, you		7 platform?	
8 didn't create page 11 of Exhibit 65; right?		8 A. No.	
9 A. I don't know whose that is, right.		9 Q. Did you receive permission from any of	
10 Q. Yeah. That's not something you did?		10 the individuals you created these items for to	
11 A. No.		11 post these pictures on your web site or Facebook	
12 Q. Okay. But the other images you put on		12 platforms?	
13 your Facebook page and your Pink Power Printing		13 A. All of them were aware that I would	
14 web site?		14 post a picture.	
15 A. Yes.		15 Q. I'm not curious if they were aware.	
16 Q. And you did that to show people what		16 I'm curious if you received any permission from	
17 you were capable of doing?		17 them to do so.	
18 A. No, because they know what I'm capable		18 A. What kind of -- could you be more	
19 of doing. I was very proud of these, and some of		19 specific?	
20 them the girls posted.		20 Q. Did you ask them if it was okay if you	
21 Q. I want to talk about your posting on		21 did that prior to doing it?	
22 your Facebook page or your web site.		22 A. Oh, sure.	
23 A. No, I -- exactly. There's girls that		23 Q. Okay. And you asked everybody in	
24 post their stuff on there, too.		24 terms of all these images if it was okay if you	
25 Q. But in terms of postings on your web		25 posted them?	
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DIRECT - YOAST (McKernan)	287	DIRECT - YOAST (McKernan)	288
1 A. To the best of my knowledge, that's --		1 Q. Did you have specific permission from	
2 I usually always say that, yes. I usually always		2 her to post these on your web site or your	
3 say, would it be all right if I post a picture		3 Facebook page?	
4 because I'm proud of it.		4 A. Yes.	
5 Q. Okay. And do you have any specific		5 Q. Exhibit (sic) 3, did you have specific	
6 recollection of whether or not you asked whomever		6 permission from someone to post that on your	
7 you created these for, these images for, as to		7 Facebook page?	
8 whether or not they were okay with you posting		8 A. From Tonie, yes.	
9 these photos?		9 Q. Tonie whom?	
10 A. I don't recall anybody not being		10 A. You have it. You have who ordered	
11 okay --		11 that. You have that in your documents.	
12 Q. Okay.		12 Q. Okay. Tonie whom?	
13 A. -- with posting pictures.		13 A. I don't -- I don't know her last name	
14 Q. Do you recall a specific conversation		14 right at the moment.	
15 with any of these individuals as to whether or not		15 Q. Okay.	
16 you had permission to post these?		16 A. Like I said, you have that on there.	
17 A. Yes.		17 I'm sure you have a piece that says that on that	
18 Q. You recall specific conversations?		18 picture.	
19 A. On, yeah, several of the newer ones.		19 Q. Exhibit (sic) 4, did you have specific	
20 You gotta understand, some of these go back a long		20 authority to post that picture from whomever you	
21 time.		21 ordered it?	
22 Q. Okay. Let's do it one by one. Images		22 A. Okay. What do you mean? You just	
23 1 and 2 were both created for Brianna Hall;		23 said authority or permission. What are you --	
24 correct?		24 Q. Permission. I'm sorry. If I said	
25 A. Yes.		25 authority, I misspoke. Did you have specific	
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DIRECT - YOAST (McKernan)	293	DIRECT - YOAST (McKernan)	294
1 Q. How do you spell that last name?		1 Q. So, yes, these are all pictures of	
2 A. I do not know how to spell Antanaitis.		2 soft goods you would have created and then posted	
3 A-N-T-A-N-A-T-I-S (sic).		3 on that Got Jobies Facebook page?	
4 Q. And then finally, page 15 of		4 A. Well, Sweet JoRaDe now. It was Got	
5 Exhibit 65, did you receive permission to post		5 Jobies back then.	
6 that on your Facebook or web site?		6 Q. Right. Did you ever receive any	
7 A. Yes. And this is from the Miss --		7 permission from JDI to post any of the images with	
8 their committee, the Miss Minnesota Committee and		8 the "Job's Daughters," "JDI," or Filiae -- "Iyob	
9 -- shoot. I gotta look up her name. I can't		9 Filiae" phrases?	
10 remember the gal's name. I did stuff for her		10 MS. FORMAN: Objection, compound and	
11 family, as well. I can't remember her name. I'm		11 vague as to by JDI. But go ahead and answer if	
12 sure it's on there. You have it.		12 you understand.	
13 MR. MCKERNAN: Okay. Dan, could you		13 A. Well, I'm confused because these are	
14 pull folder 11, and we're going to mark that as		14 not all Jobie-related items at all. There's	
15 Exhibit 66?		15 other --	
16 (Deposition Exhibit Number 66 was		16 Q. I agree 100 percent. My question was,	
17 marked for identification.)		17 with respect to the soft good items that are set	
18 Q. Do you have Exhibit 66 in front of		18 forth in Exhibit 66 that contain the phrase "Job's	
19 you?		19 Daughters," "JDI," or "Iyob Filiae," did you ever	
20 A. Uh-huh.		20 receive permission from anyone at Job's Daughters	
21 Q. Are these all photos of soft goods		21 to post those goods on your Facebook page?	
22 that you would have created and then posted on		22 MS. FORMAN: Objection to the extent	
23 your Got Jobies web -- or Facebook page?		23 that it's compound. But go ahead and answer.	
24 A. Well, these are screen shots of a		24 A. Well, of course because the people	
25 Facebook page.		25 that had purchased them were representing Job's	
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DIRECT - YOAST (McKernan)	295	DIRECT - YOAST (McKernan)	296
1 Daughters.		1 A. Yep.	
2 Q. Okay. Is it your testimony that		2 Q. Is this a true and accurate copy of	
3 because you received the orders from people		3 the Sweet JoRaDe Facebook page that you have?	
4 representing Job's Daughters, that you received		4 A. No.	
5 permission from Job's Daughters to post these on		5 Q. Okay. What is Exhibit 67?	
6 your Facebook?		6 A. What is that? Oh. No, no, no, no.	
7 A. Yes.		7 That's a Square Up. It's like a merchant account.	
8 Q. Okay. Did you ever receive any		8 Q. Okay. These are items that you're	
9 permission from the Job's Daughters trademark		9 advertising on Sweet JoRaDe for being for sale;	
10 liaison to post any of these images on your		10 correct?	
11 Facebook page?		11 A. They were. I mean they're not now.	
12 A. No.		12 They're -- that was limited just because of the	
13 Q. Did you ever receive permission from		13 ways-and-means project on that.	
14 anyone on the board of trustees or the supreme		14 Q. Okay. But these are items that you	
15 guardian council to post any of these images on		15 were offering for sale on your Facebook page?	
16 your Facebook page?		16 A. I could do a custom order of those.	
17 A. No.		17 Those are things you could custom order, yes.	
18 MR. MCKERNAN: Okay. Dan, could you		18 Q. I understand that, but my question	
19 hand the witness folder 10, which I'm going to		19 was, Exhibit 67 shows items that you were offering	
20 mark as Exhibit 67?		20 for sale on your Facebook page?	
21 THE WITNESS: Thank you.		21 A. Okay. I'm confused because you can't	
22 (Deposition Exhibit Number 67 was		22 order somebody else's coat with their name on it.	
23 marked for identification.)		23 Q. Okay. This is your Facebook page?	
24 Q. Do you have Exhibit 67 in front of		24 A. It's not Facebook.	
25 you?		25 Q. Sweet JoRaDe is what?	
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DIRECT - YOAST (McKernan)	297	DIRECT - YOAST (McKernan)	298
1 A. This is -- like I said, this was part		1 Q. Did you ever receive any permission	
2 of a merchant account.		2 from JDI to post any of those images and offer for	
3 Q. Okay. That you ran?		3 sale on whatever platform this is? I think you	
4 A. Square Up, yeah. Well, no -- well, I		4 said a Square account.	
5 guess technically it's -- yes, I utilized them		5 A. Yes. I'm confused because it's not --	
6 hosting it.		6 like I said, those are just merely samples of	
7 Q. Okay. And you were offering these		7 things I've done in the past to give somebody an	
8 items for sale?		8 idea of what they could potentially order.	
9 A. I was offering the ability to custom		9 Q. It's advertising for you of what	
10 order something in that likeness, not -- those		10 someone could order if they called you?	
11 items are not for sale.		11 A. I guess it is. I mean I think it's a	
12 Q. Okay.		12 sample. I think it's an idea. It's something	
13 A. Those are samples. Those are not for		13 I've done. I mean it's my artwork.	
14 sale, those items that you're seeing.		14 Q. Did you ever receive any permission	
15 Q. Oh, okay. So if I called up and said,		15 from anyone at JDI to utilize these samples, these	
16 I want "What would Mother Mick say?" T-shirt --		16 ideas, or these advertisings, however you define	
17 A. Right.		17 it, on this particular platform?	
18 Q. -- your response would be what?		18 A. And these are not all Jobie goods.	
19 A. My response would be, great, what		19 These are Rainbow things, too. No, not from --	
20 would you like it on, what color would you like,		20 no.	
21 would you like your name on it. I don't have any		21 Q. Okay.	
22 pre-made anything. There's nothing in my shop		22 THE WITNESS: While you're looking,	
23 that's pre-made like that. So it's an idea that		23 can I take another pee break? I'm so sorry.	
24 somebody -- and most people would embellish on it		24 MR. McKERNAN: Yes.	
25 or got their name or glitter or something.		25 (A short recess was taken from	
THIBAULT, SUHR & THIBAULT, INC.		THIBAULT, SUHR & THIBAULT, INC.	
Omaha, Nebraska (402) 331-2500		Omaha, Nebraska (402) 331-2500	
DIRECT - YOAST (McKernan)	299	DIRECT - YOAST (McKernan)	300
1 6:56 p.m. until 6:59 p.m.)		1 Q. Okay. So this lists costs of hoodies	
2 MR. McKERNAN: Dan, could you hand		2 and full-zips; correct?	
3 folder 25 to Ms. Yoast, and we're marking that as		3 A. Yes.	
4 Exhibit 68?		4 Q. Is this your cost?	
5 (Deposition Exhibit Number 68 was		5 A. Oh, yes.	
6 marked for identification.)		6 Q. Okay.	
7 THE WITNESS: Okay. I got it.		7 A. That's wholesale.	
8 BY MR. McKERNAN:		8 Q. Okay. What about your wholesale costs	
9 Q. Do you recognize Exhibit 68?		9 for T-shirts?	
10 A. Yes.		10 A. For a T-shirt?	
11 Q. And is that a cost breakdown you		11 Q. Correct.	
12 created?		12 A. Depending on which one I use, whether	
13 A. Yes.		13 it's a performance T-shirt, cotton, or a blend. I	
14 Q. What's the purpose of creating		14 mean there's lots of avenues. What kind are you	
15 Exhibit 68?		15 talking about?	
16 A. I think I was asked to come up with,		16 Q. I'm trying to get my arms around	
17 like, how much that could cost to make an item,		17 understanding what your cost of goods sold would	
18 what it actually cost her to make something.		18 be for the various items set forth in your profit	
19 Q. What documents did you review to		19 and loss.	
20 create Exhibit 68?		20 A. Sure. So -- well, it's -- I would	
21 A. Receipts at how much I pay at my --		21 really need you to be specific or I can't give you	
22 you know, the wholesaler that I get, how much I		22 -- because there's a big difference between the	
23 pay for a piece of vinyl, how much I pay for a		23 different types of shirts.	
24 piece of glitter, and how many hours it takes to		24 Q. Okay.	
25 pick one of those items.		25 A. I can provide that for you if you'd	
THIBAULT, SUHR & THIBAULT, INC.		THIBAULT, SUHR & THIBAULT, INC.	
Omaha, Nebraska (402) 331-2500		Omaha, Nebraska (402) 331-2500	

August 17, 2016

VIA FEDERAL EXPRESS AND EMAIL TO PINKPOWERPRINTING@GMAIL.COM

Ms. Heidi Yoast
Pink Power Printing
23149 SE 184th St.
Maple Valley, Washington
98038

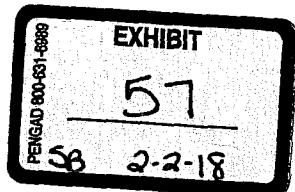
Re: Job's Daughters International

Dear Ms. Yoast,

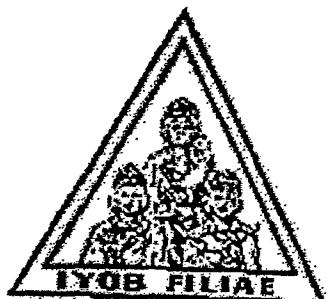
This firm represents Job's Daughters International ("JDI") of Papillion, Nebraska. It has come to our attention that you are using the designations JOB'S DAUGHTERS, JOB'S DAUGHTER, IYOB FILIAE, THE DAUGHTERS OF JOB, and a logo consisting of a double triangle and the wording JOB'S DAUGHTERS within the triangles ("the Infringing Marks") on numerous clothing items and advertising those clothing items for sale online at <https://www.facebook.com/GotJobies> and at <https://squareup.com/store/pink-power-printing>.

JDI is the owner of numerous trademarks including, but not limited to, the following trademarks ("JDI's Marks"):

1. JOB'S DAUGHTERS;
2. JOB'S DAUGHTERS INTERNATIONAL;
3. INTERNATIONAL ORDER OF JOB'S DAUGHTERS;
4. IOJD;
5. JD INTERNATIONAL;
6. JD INTERNATIONAL and Design, shown below;



7. IYOB FILIAE and Design, shown below;



8. IYOB FILIAE;

9. JOB'S DAUGHTERS KIDS HELPING KIDS HIKE and Design, shown below; and,



10. HIKE.

Your use of the Infringing Marks appears to be made with the intent to trade on the goodwill associated with JDI's Marks. Your unlawful use of the Infringing Marks creates the false impression that JDI is somehow connected or associated with you so as to deceive, cause confusion or mistake as to the affiliation of your goods with JDI's goods. Such use constitutes conduct that is actionable under federal statutes for trademark infringement, trademark dilution, false designation of origin and unfair competition in violation of the Trademark Act of 1946, as amended, 15 U.S.C. § 1051 et. seq. All of those causes of action entitle our client to the recovery of damages and injunctive relief.

I am also advised that you have been notified in writing, on at least two occasions, to cease use of the Infringing Marks but that you have declined to do so. I am also in possession of a copy of your letter dated August 11, 2016 to Ms. Shelly Cole wherein you apparently take the position that since you do not use JDI's "legally registered marks" on your "commercial artwork", that any other use by you of marks that are not identical to JDI's registered marks is not infringing. Please be advised that: 1) a trademark owner is not required to register a trademark in order to own trademark rights; and, 2) liability for trademark infringement arises by use of a mark likely to cause confusion, as set forth above, regardless of whether the trademark is identical. Therefore, your conduct is indeed unlawful. We recommend you seek the advice of an attorney who practices in the area of trademark law.

August 17, 2016

Page 3

JDI has a right and a duty to enforce its trademark rights against others. Therefore, JDI demands you, your agents, representatives, related companies, subsidiaries, affiliates, employees, and all those acting in concert with you, to immediately take the following actions:

1. Cease and desist from all further use of the Infringing Marks and any other designations likely to cause confusion and/or dilution of JDI's Marks;
2. Destroy any and all materials in your possession or control bearing the Infringing Marks, as well as any and all materials in your possession or control bearing any designation likely to cause confusion with JDI's Marks;
3. Provide the undersigned counsel with sufficient information to determine the full amount of your gross revenues and profits derived from your use of the Infringing Marks;
4. Provide the undersigned counsel with written confirmation that you have complied with these demands.

JDI further demands that you provide, by no later than the close of business on September 9, 2016, written confirmation to the undersigned that you will comply with these demands in a timely manner. If the undersigned does not receive a satisfactory and timely response, JDI is prepared to take all steps necessary to protect its valuable intellectual property rights, without further notice to you.

You also advise in the aforementioned letter that you may have an intellectual property attorney. If you are represented by counsel, please immediately direct this letter to him or her.

Sincerely,



DENISE C. MAZOUR

DCM:sd
cc: Susan Goolsby



*Job's Daughters International
Supreme Guardian Council*

*Kathleen E. Wiekhorst
Trademark Liaison, Board of Trustees*

*Heidi Yoast
Pink Power Printing
Maple Valley, Washington
425-295-4324*

April 1, 2014

Dear Heidi,

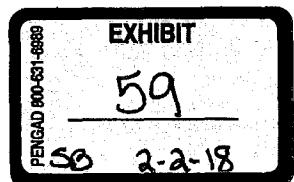
Thank you so much for extending the opportunity to us; we certainly appreciate your interest. However, Doc Morgan and the specific SAC committees are the only booths that we can have during the Supreme Session.

I am enclosing the portion of our constitution that deals with the trademark and its use. In order for you to use the trademark to sell merchandise you must submit a request or email me, often with a picture of the item. I keep this for our records. Anytime you do use the logos, words/letters... Job's Daughters, JD; a royalty of 20% must be sent to the Supreme Office.

Thank you again for your interest and am so glad you are still involved in our wonderful Order. I have been a Job's Daughter now for 48 years, so certainly do appreciate your dedication.

Sincerely,

*Kathleen E. Wiekhorst
Board of Trustees, Job's Daughters International
Trademark Liaison
180 Cedar Street
Green River, WY 82935
307-875-7269 or 307-389-8073*



SUPPLEMENTAL INSTRUCTION NUMBER 3

OFFICIAL TRADEMARK AND ITS USE

1.

(a) The **THREE POINT** emblem Trademark of our Order: The Trademark referred to consists of a double triangle enclosing a replica of three girls wearing robes, capes, and crowns holding a cornucopia, dove, and urn within the inner triangle, and the words "TYOB FILIAE" at the base between the inner and outer triangle. This is the **OFFICIAL EMBLEM**.

(b) The **JDI Logo** - Corporate emblem of Job's Daughters International. The Trademark referred to consists of a double triangle enclosing the letters J and D and the word "International" at the base of the triangle. This is the **Corporate Logo**.

(c) The name "**Job's Daughters International**" is a registered Trademark of the Order.

(d) The names and phrases "Job's Daughters", "TYOB FILIAE", "Daughters of Job", "International Order of Job's Daughters", "IOJD", "JDI" and "JD International" are protected by Job's Daughters International and by the Board of Trustees from inappropriate use.

Bethels may use the Three Point emblem, the JDI Logo or the Name "Job's Daughters International" for printing stationary, programs, invitations, napkins, and Bylaws without applying for permission.

GGCs and JGCs may use the Three Point emblem, the JDI Logo or the Name "Job's Daughters International" for printing stationery, programs, invitations, napkins, state and province publications, Manuals, and forms for use and for sale to Bethels within their jurisdiction without applying for permission.

For use of the Three Point emblem, the JDI Logo or the Name "Job's Daughters International" for purposes other than those specified, Bethels, GGCs and JGCs must secure and use application, Form 280, to request permission. Permission is granted by a member of the Board so designated as Chairman of Trademark (listed annually in the Supreme Directory) when in compliance with the accepted rules and regulations of the Board. Permission shall expire on August 1st following the date of the approved Form 280. Reapplication may be made from year to year.

2. The **SEVEN POINT** seal of the **SUPREME GUARDIAN COUNCIL**:

The Trademark is superimposed on a background that has **SEVEN POINTS** which attach this portion to a circular band inscribed **INTERNATIONAL ORDER OF JOB'S DAUGHTERS**.

Its use is restricted to stationery and other printed matter distributed by the SGC as directed by the Supreme Guardian and Board of Trustees.

3. The **FIVE POINT** seal of **GRAND GUARDIAN COUNCILS**:

The Trademark is superimposed on a background that has **FIVE POINTS** which attach this portion to a circular band inscribed over the top **GRAND GUARDIAN COUNCIL**, and at the bottom, the name of the GGC.

Its use is restricted to stationery and other printed matter distributed by the GGC, named, and considered official or sanctioned by the Grand Guardian.



EXHIBIT

605

FBI/DOJ-SAC

2-7-18





Sweet Jorade's Post



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Miss Washington
Job's Daughter
Sisterhood of The Traveling Cap

Sweet Jorade's Post



Like



Comment



Share





Sweet Jorade's Post

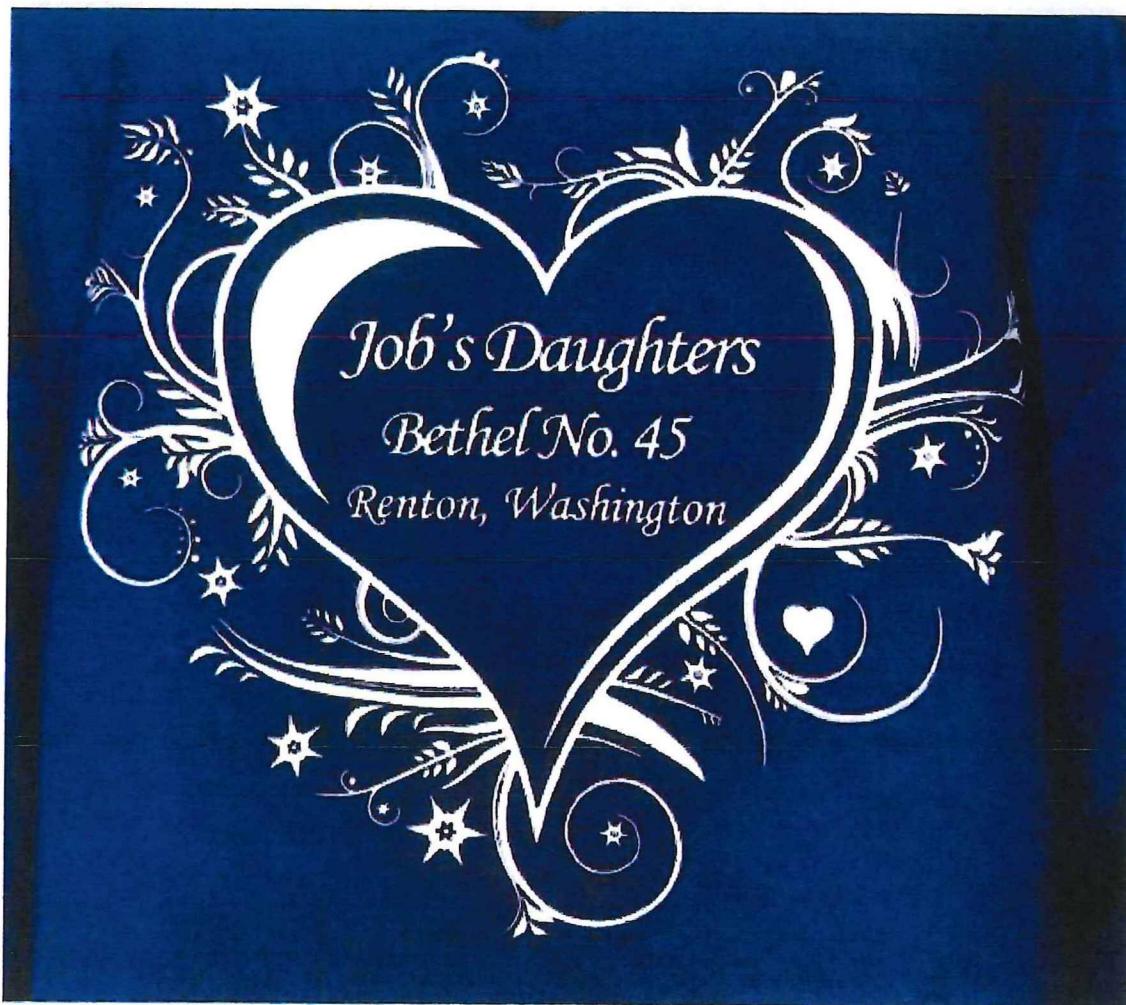


1

Like

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Like



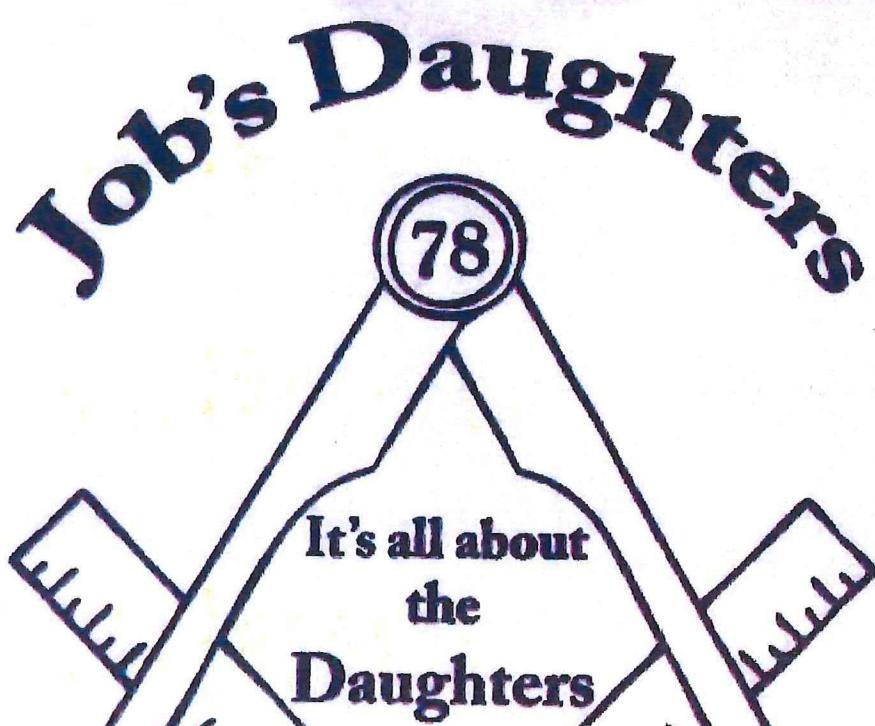
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Share

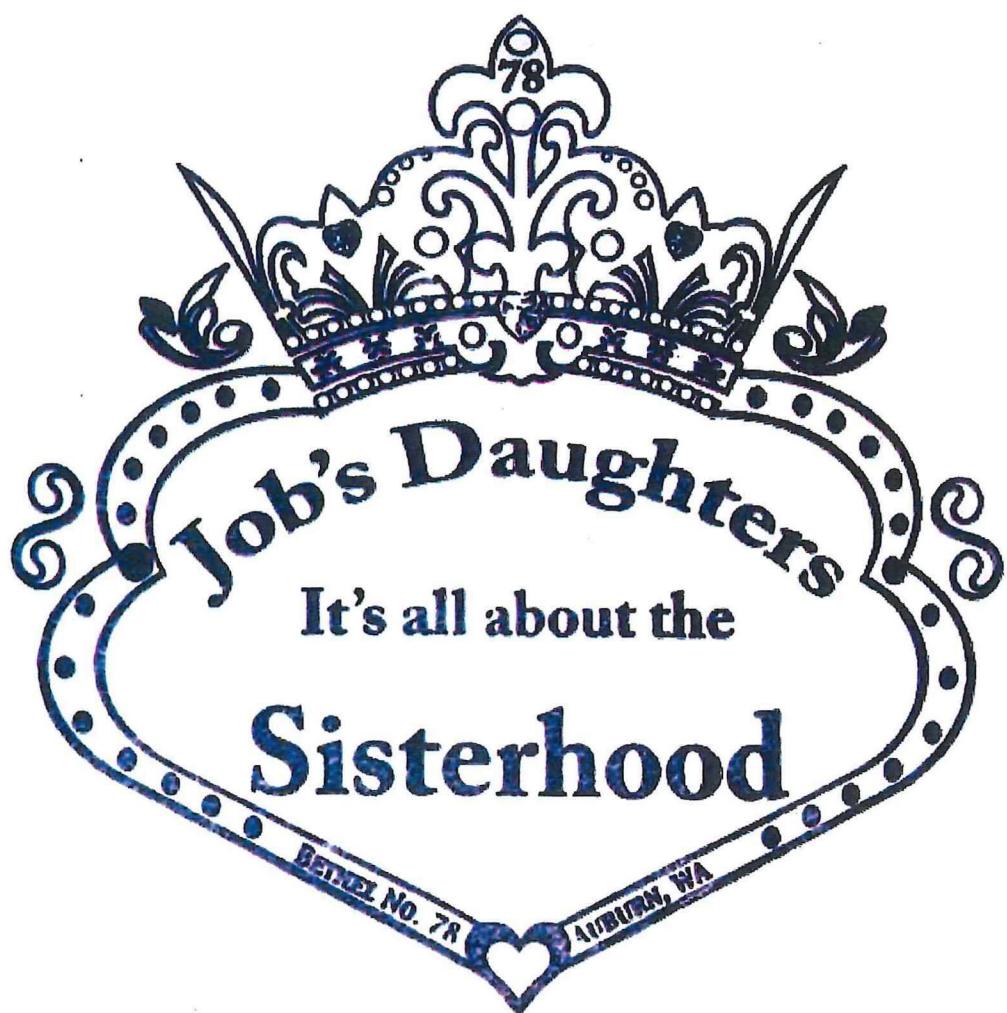


Sweet Jorade's Post

[Like](#)[Comment](#)[Share](#)



Sweet Jorade's Post



Like

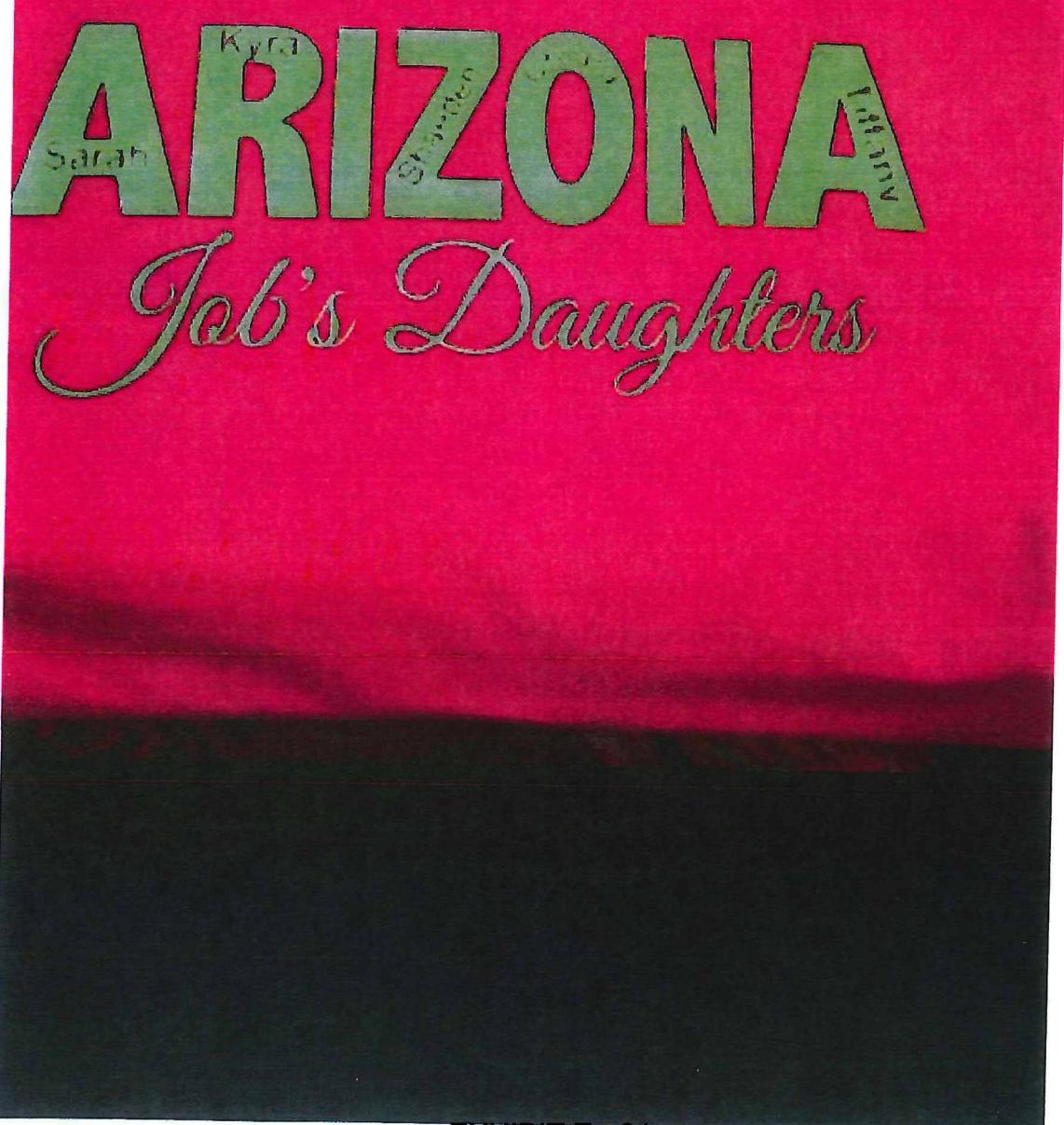


Comment



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ARIZONA
Job's Daughters

Arizona

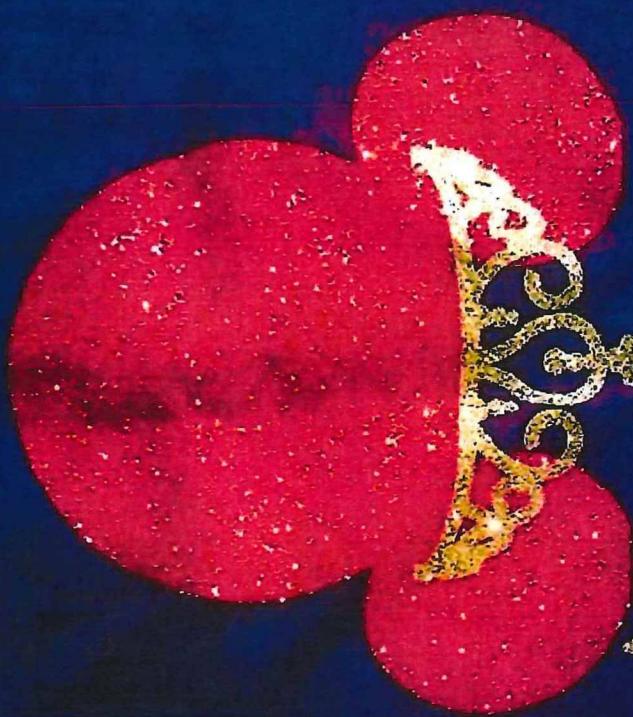


Bethel No. 22

Job's Daughters

Lois' Daughters

*Creating more Princesses
than Disney*



Since 1920

O. "

Miss Oregon
Bex
Bixby
2014-2015
Job's Daughter
PHQ Bethel No. 16

1996

Miss Delaware

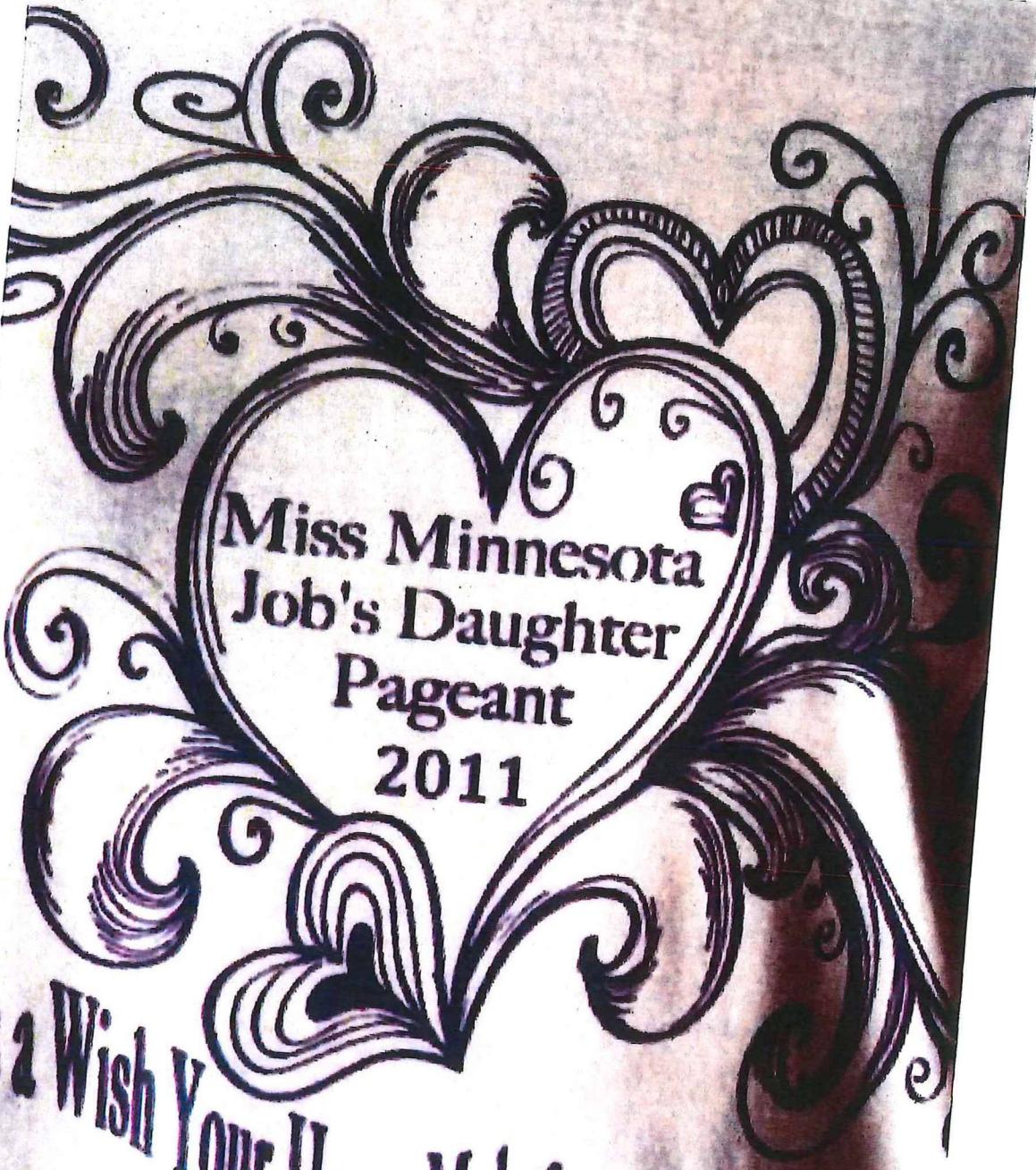


Job's Daughter

2015-2016

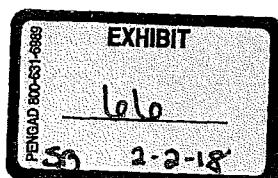
Swim team. Enjoy life



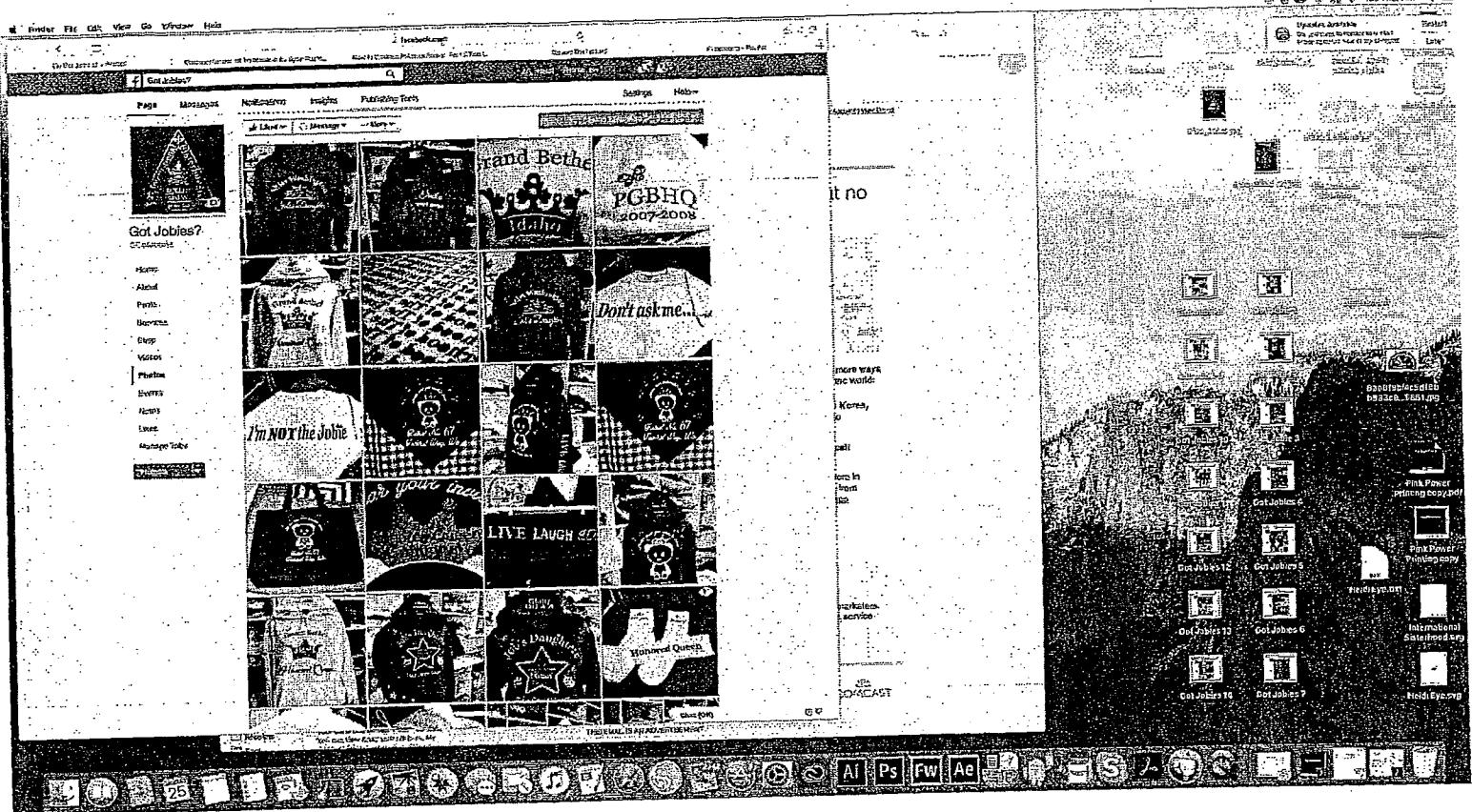


Miss Minnesota
Job's Daughter
Pageant
2011

is a Wish Your Heart Makes...



A high-contrast, black and white screenshot of a Facebook page for "Got Jobies?". The page features a grid of 18 profile pictures, each containing a different graphic or message related to "Jobies". The sidebar on the left lists various page tabs like Home, About, Posts, Services, Shop, Videos, Photos, Events, Notes, Likes, and Manage Tabs. The main navigation bar at the top includes Page, Messages, Notifications, Insights, Publishing Tools, Settings, and Help. The top right corner shows account details for "Esthermets - PurPj1".



YOAST-00002455

EXHIBIT E - 40

facebook.com

(4) Got Jobs? - Photos Department Use of Trademarks by Ryan Pritchard Hover to Create a Personalized Facebook Effect

Secure Dashboard Statements - Pay Pal

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14 Liked 1 Message More

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Photos

Events

Notes

Likes

Manage Tabs

Freemasons of Washington added 3 new photos: "AM getting properly clothed for the..." 49 minutes ago

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Freemasons of Washington added 3 new photos: "AM getting properly clothed for the..." 49 minutes ago

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Account View Online

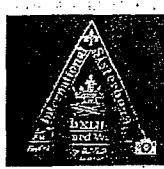
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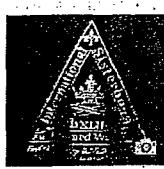
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Like Message More

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Profile

1 Liked 1 Message More

Grand Bethel Honored Queen Jessi 2009-2010 Jessi Best CAV EVER! Jessi Madison 2013-2015 Believe in YOURSELF THROUGH YOUR BRAIN ADVENTURES IN Job's Daughters

What would Mother Mick say? What would Mother Mick say? What would Mother Mick say?

Miss Phoenix Job's Daughters 2013-2014 Phoenix, Az. Eric Chap Sweetheart

Chat (Off)

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Receipts You can view your bill here. My Email

From: Sent: 

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more ways the world: Korea, cell more in from app

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Comments: Use of Trademarks by Ryan Pittman

How to Create a Polished Raised Text Effect

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Home About Posts Services Shop Videos Photos Events Notes Likes Manage Tabs Premium

OMIO

Celeste 2014-2015

Congratulation

Congratulation 2014-2015

Ohio Miss

Jeb's Daughter

Reach For The Stars

Brooke 14-2015

Miss California

Jeb's Daughter

Rachel 2014-2015

Miss California

Jeb's Daughter

Miss Kansas

Jeb's Daughter

2014-2015

Chat (Off)

Receipts

Just Jim is due on 10-24-2014. Click here to view your bill.

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got Jobies?

Boutiques

Home

About

Photos

Likes

Videos

Posts

Manage Tabs

+ Add Shop Section

Example

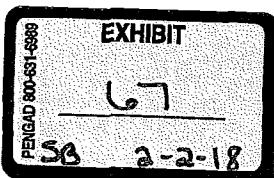
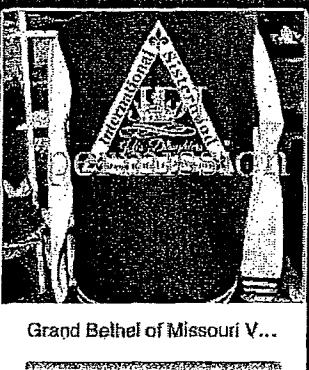
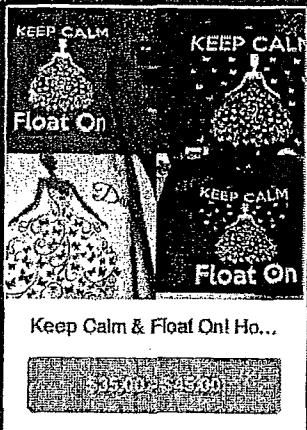
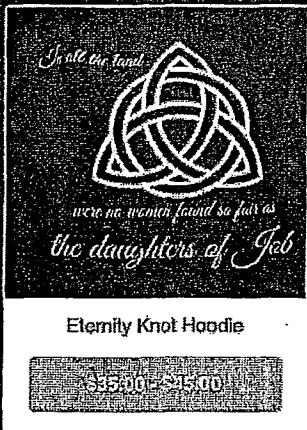
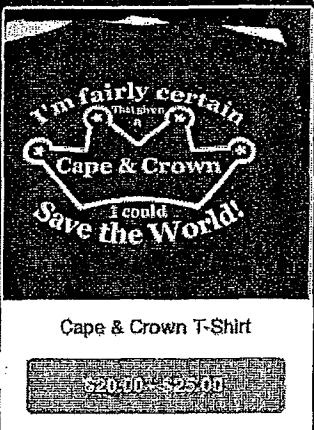
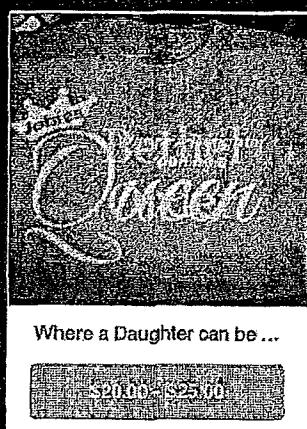
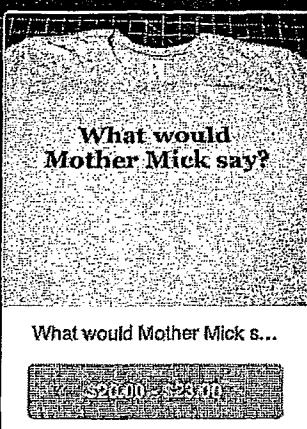
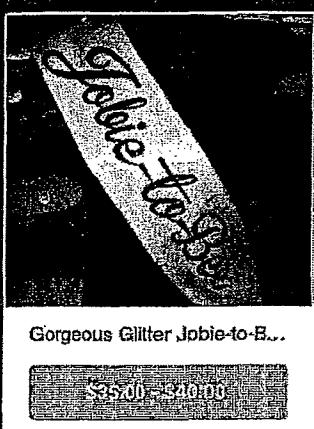
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SWEET JORADE

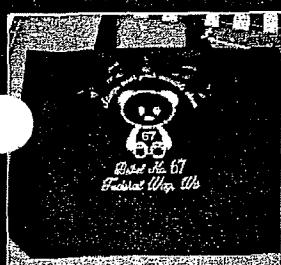
All things Jobies, Rainbow, Sweetheart/Sorority, & DeMolay



Change Theme

Offline

View/Print



Custom Term Totes

\$20.00



Custom Tote Bags

\$15.00



Miss Job's Daughter Hoodie

\$35.00-\$25.00



Miss Congeniality Job's Da...

\$35.00-\$30.00



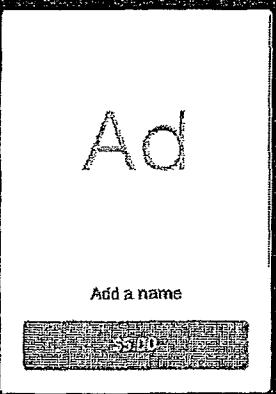
Grand Bethel Honored Que...

\$55.00-\$60.00



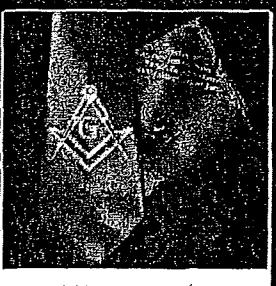
Ladies Port Authority Short...

\$15.00



Add a name

\$5.00



Joble/Mason Tie Set

\$35.00



Cranky Pants Sweats/Blac...

\$34.00

1 The Honorable Robert S. Lasnik
2
3
4
5
6

7 UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

8 JOB'S DAUGHTERS INTERNATIONAL,

9 Plaintiff,
10 v.
11 HEIDI YOAST,
12 Defendant.

13 HEIDI YOAST,
14 Counterclaim-Plaintiff,
15 v.
16 JOB'S DAUGHTERS INTERNATIONAL,
SHELLY COLE aka SHELLY HOWRIGON,
17 an individual, ROD REID, an individual,
18 Counterclaim-Defendants.

19

20 16:17-19:10

21 Exhibit 1

22

23

24

25

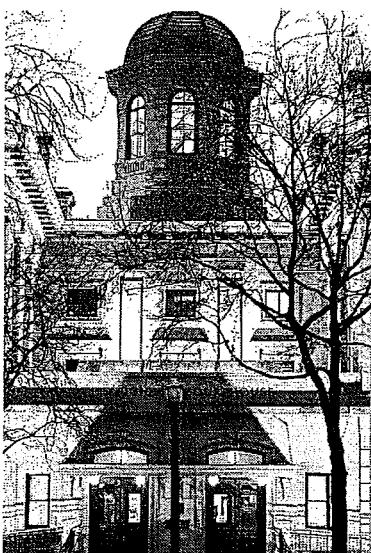
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28



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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOB'S DAUGHTERS
INTERNATIONAL,

Plaintiff,

vs.

HEIDI YOAST,

Defendant;

No. 16-CV-01573-RSL

and,

HEIDI YOAST,

Counterclaim Plaintiff,

v.

JOB'S DAUGHTERS
INTERNATIONAL, SHELLY
COLE aka SHELLY HOWRIGON,
an individual, ROD REID,
an individual,

Counterclaim Defendants.

CONFIDENTIAL

DEPOSITION OF

RODNEY REID

TAKEN ON
THURSDAY, SEPTEMBER 14, 2017
9:15 A.M.

WILLIAMS KASTNER
601 UNION STREET, SUITE 4100
SEATTLE, WASHINGTON 98101

1 A. No.

2 Q. I'd like to talk a little bit about your
3 interactions with my client, Heidi Yoast. While you served
4 as Associate Bethel Guardian for Bethel 43, did you or your
5 Bethel -- or its members order any products from Heidi
6 Yoast?

7 THE REPORTER: Can you slow down?

8 MR. MCKERNAN: Object to form and foundation.

9 A. Yeah. I was a member of -- of Bethel 43, and we
10 did use Heidi for t-shirts, I believe, more than one time.

11 Q. (By Ms. Forman) Did you look at any of Heidi
12 Yoast's products before your Bethel placed that order?

13 A. I don't believe so.

14 Q. Do you recall purchasing a Past Grand Bethel
15 Honored Queen hoodie from Heidi Yoast?

16 A. I didn't. I believe my stepdaughter might have.

17 MS. FORMAN: Okay. So I would like you to take a
18 look at this document. This is entitled, "Heidi Yoast notes
19 by Rod Reid." It was part of the production by Job's
20 Daughters International, and it's Bates number JDI 000196. I
21 will tab this as Exhibit 1.

22 (Exhibit 1 marked for identification.)

23 Q. (By Ms. Forman) So the document in front of you
24 entitled, "Heidi Yoast notes by Rod Reid," did you write
25 this document?

1 A. I did.

2 Q. Do you recall when you wrote this document?

3 A. It was my recollection -- it probably was --
4 probably a year or maybe more ago.

5 Q. Why did you write this document?

6 A. Because it came up that I tried to contact Heidi
7 Yoast, and it became -- I -- I -- we thought maybe important
8 to the case.

9 Q. Did anyone ask you to write this document?

10 MR. MCKERNAN: I'm gonna object just to the extent
11 that asks you to disclose any attorney-client
12 communications. To the extent you can answer that, Rod,
13 without divulging any attorney-client communications, you're
14 free to answer. If you would have to get into discussions
15 had with or a direction of counsel, I would instruct you not
16 to answer that question.

17 A. The board did discuss everything that had gone on
18 having to do with Heidi, and I believe I produced them at
19 that time.

20 Q. (By Ms. Forman) Do you have any other notes
21 relevant to this case that have not already been produced or
22 provided?

23 A. Not that I know of.

24 Q. Do you recall which month you called Heidi Yoast's
25 shop?

1 A. Not exactly. I believe it -- it was -- it was
2 after our midyear meeting, which was the first part of March
3 in 2015. I waited until I got home, and it was either
4 toward the end of March or the first of April.

5 **Q. Do you recall any phone calls to Heidi Yoast in**
6 **October of 2015?**

7 A. No. I -- I only tried contacting her once.

8 **Q. Do you recall which number you called her shop**
9 **from?**

10 A. It was from my home, so it was either my home
11 phone or my cell phone, one of the two.

12 **Q. Can you provide us with both of those phone**
13 **numbers, home number first, please?**

14 **MR. MCKERNAN:** I would -- I would mark this
15 transcript as confidential to the extent either your home
16 number or your cell number is not published.

17 **MS. FORMAN:** Agree to that.

18 A. Okay. My home phone is area code (360) 871-7717,
19 and my cell phone is area code (360) 731-3652.

20 **Q. (By Ms. Forman) Did you discuss your phone call**
21 **to Heidi Yoast's shop with anyone other than members of the**
22 **board of trustees?**

23 **MR. MCKERNAN:** I'm gonna object to the extent that
24 requires you to get into attorney -- or communications
25 you've had with your lawyer at your lawyer's request. To

1 the extent you can answer that outside of those
2 communications or outside of directions from your lawyer,
3 feel free to answer, sir.

4 Q. (By Ms. Forman) And I'll -- I'll actually
5 rephrase. Did you discuss this phone call with -- to Heidi
6 Yoast's shop with anyone other than any attorneys that might
7 have been representing you, or Job's Daughters
8 International, or the board of trustees to avoid any
9 confidentiality issues?

10 A. I think I shared it with my wife.

11 Q. During your term on the board of trustees, do you
12 recall how many cease and desist letters the board of
13 trustees sent to Heidi Yoast?

14 MR. MCKERNAN: Foundation. Go ahead and answer,
15 Rod.

16 A. I don't know the number, I just know I can
17 remember some of them. That's all I can say.

18 MS. FORMAN: I'd like to enter this second
19 exhibit. This is a document entitled -- actually, it
20 doesn't have a title, but it's a letter addressed to Heidi
21 Yoast from Job's Daughters International. It's Bates
22 stamped JDI 00058. I'll mark this as Exhibit 2.

23 (Exhibit 2 marked for identification.)

24 MR. MCKERNAN: That's the letter dated December
25 30th, Patricia?

HEIDI YOAST NOTES BY ROD REID

At the early March mid-year meeting in Tampa, Florida (March, 2015) I volunteered to meet with Heidi Yoast to discuss the Trademark issues. I did this because I am from her state and the Bethel that I associate with has used her in the past to print T-shirts. (No trademark images). I live about an hour's drive away. When I returned home from the meeting in Tampa I called her shop to set up a meeting. My idea was to discuss the issues with her and show her how to work within the system. When I called to make an appointment her husband answered and he quickly recognized my name and said "I know who you are and you are the one from this state who got elected to the Board." I asked if I could meet and talk with he and Heidi to discuss the Trademark issues. He quickly cut me off and told me that this issue would be handled by their attorneys. He then hung up!

JDI 196

EXHIBIT F - 7

EXHIBIT	
DEPONENT NAME:	DATE:
Rod Reid	9/14/17